

AMOS

VS

THE LAMPO GROUP LLC, et al.

---

DISCOVERY DISPUTE CONFERENCE

May 02, 2023



**Michelle Checuga, LCR**

Chattanooga (423)266-2332 Jackson (731)425-1222  
Knoxville (865)329-9919 Nashville (615)595-0073 Memphis (901)522-4477

[www.elitereportingservices.com](http://www.elitereportingservices.com)

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

BRAD AMOS,

Plaintiff,

vs.

Case No. 3:21-cv-00923

THE LAMPO GROUP, LLC,  
et al.,

Defendants.

DISCOVERY DISPUTE CONFERENCE

May 2, 2023

Commencing at 12:04 p.m. CST

Elite-Brentwood Reporting Services  
www.elitereportingservices.com  
Michelle Checuga, LCR, RPR  
555 Marriott Drive  
Nashville, Tennessee 372214  
(615) 595-0073

Page 2

A P P E A R A N C E S

For the Plaintiff:

MR. JONATHAN A. STREET

Attorney at Law

The Employment & Consumer Law Group

1720 West End Avenue, Suite 402

Nashville, TN 37203

(615) 850-0632

street@eclaw.com

For the Defendants:

MS. LESLIE GOFF SANDERS

Attorney at Law

Jackson Lewis, P.C.

611 Commerce Street, Suite 3102

Nashville, TN 37203

(615) 565-1661

leslie.sanders@jacksonlewis.com

Page 3

\* \* \*

MS. SANDERS: Okay, you ready, Jon?

You good to go.

MR. STREET: Uh-huh.

MS. SANDERS: All right. I've got --

I've got a small list of things, I thought  
maybe we could just go in buckets.

MR. STREET: Okay.

MS. SANDERS: Like, so to start with,  
I think this is an easy one, you had issued a  
subpoena. I don't know how you pronounce it,  
but they're doing business as INC Mansueto [sp]  
maybe? I'm not seeing those documents, so I  
don't know, maybe you --

MR. STREET: From INC?

MS. SANDERS: Uh-huh.

MR. STREET: We didn't get any.

MS. SANDERS: Okay, got it. I just  
had that on my list.

And then as far as the subpoena to  
Melissa Amos, she wants to do the deposition,  
instead of the 11th, on the 9th. We already  
have -- who do we have on the 9th -- Armando  
Lopez on the 9th.

MR. STREET: Uh-huh.

Page 4

MS. SANDERS: So do you want to do  
them both on the same day? I can move Armando  
to the 11th if you'd rather swap them.

MR. STREET: Uh-huh. His personal  
depo, maybe -- can we -- is there any chance --  
I really am supposed to go get a CT scan  
tomorrow.

MS. SANDERS: Okay.

MR. STREET: I'd really like to  
change Laura Johnson to next week because of  
that.

MS. SANDERS: Yeah, I've got her on  
the list, too. You asked me to check on the  
8th and 10th. Laura -- those were days she'd  
originally given me. She did e-mail me, and  
let me just pull that up because I -- she  
e-mailed -- I know that it's going to work, I  
just don't know -- it's either the 8th or the  
10th. Let me see what she says.

I think she's okay on both dates. For  
me, the 8th would be better, but let me just  
double-check that.

MR. STREET: That's the day we've got  
JB Wagner right now.

MS. SANDERS: Yeah.

1 MR. STREET: Okay, that might -- I  
2 don't think that that one -- I think it'll take  
3 all day.  
4 MS. SANDERS: Laura or JB?  
5 MR. STREET: Both.  
6 MS. SANDERS: Or both -- okay.  
7 She says the 10th -- Laura says the 10th  
8 is better than the 8th, but she can make either  
9 work. So the 10th is David DiCicco. The 8th  
10 is Laura and -- or is JB.  
11 MR. STREET: Right.  
12 MS. SANDERS: So which day would you  
13 rather do her?  
14 MR. STREET: But she can't do any day  
15 besides the 8th or 10th?  
16 MS. SANDERS: Those are the only days  
17 she had next week. I've made -- those are the  
18 only days that she had given me for next week,  
19 and I asked her if she had any others. And so  
20 far, the 10th and the 8th, she's still got  
21 them. She's booked something on the 8th, but  
22 she says she can change it.  
23 MR. STREET: Oh, okay.  
24 Yeah, while we're here, I think we are  
25 probably going to ask the Court to give us a

1 few more weeks to finish these up.  
2 MS. SANDERS: Okay. Yeah, we're --  
3 we're not going to agree, but that's certainly  
4 your prerogative.  
5 MR. STREET: Uh-huh. So...  
6 MS. SANDERS: And I'm willing to do  
7 the 8th like a long day, you know, if that  
8 helps. The issue on the 10th is David DiCicco  
9 does not work at Ramsey anymore.  
10 MR. STREET: Uh-huh.  
11 MS. SANDERS: So coordinating him is,  
12 you know, more trouble --  
13 MR. STREET: We'll just keep her  
14 tomorrow.  
15 MS. SANDERS: Well, I've already --  
16 well, now I've already called her off tomorrow.  
17 Let me make sure. You do want to keep her  
18 tomorrow, though?  
19 MR. STREET: Yeah, I mean, because  
20 we've got -- like I said, we've got one on the  
21 8th and the 10th, so we can't -- we got  
22 DiCicco.  
23 MS. SANDERS: Okay. Let me just --  
24 I'm going to ask her that while I'm here, just  
25 to make sure.

1 MR. STREET: And we have somebody  
2 Friday.  
3 MS. SANDERS: That's Luke LeFevre.  
4 MR. STREET: Okay.  
5 MS. SANDERS: I might be able to  
6 move -- I might be able to move JB. I didn't  
7 think about that. Like, we might can to move  
8 JB to the 11th. I don't know, let me look and  
9 see if that's a date that we had for him. Let  
10 me look and see.  
11 Because he's -- he works at Ramsey, so, I  
12 mean, he's -- he -- he and Laura are easier to  
13 schedule because they are employees. Let's  
14 see.  
15 All right. Do you have Wi-Fi, guest  
16 Wi-Fi, John?  
17 MR. STREET: Uh-huh. It should be EC  
18 Law, and the password -- let me see, I always  
19 forget what it is.  
20 MS. SANDERS: Because you never have  
21 to connect.  
22 MR. STREET: Exactly.  
23 THE REPORTER: Actually, it might be  
24 right here.  
25 MS. SANDERS: Oh, yeah. There we go.

1 Is that it? Okay, yeah.  
2 I don't know that it's showing up, let me  
3 look.  
4 Here we go, E and C, okay.  
5 MR. STREET: I'm sorry, did you want  
6 some coffee or a soda or something like that?  
7 MS. SANDERS: No, I'm good. Thank  
8 you.  
9 Let's see. This might be faster if I  
10 connect to your -- because I'm having to look  
11 locally. Oh, it's telling me I can't connect.  
12 Did you connect? Are you connected?  
13 THE REPORTER: I don't use Wi-Fi.  
14 MS. SANDERS: Let me try it again.  
15 All right, let me try one more time. If  
16 not, I can -- I can probably get it on my  
17 phone. There we go.  
18 All right, let's see.  
19 Okay. Sorry, it's just taking me a  
20 while.  
21 Yeah, I'm not finding JB's availability.  
22 The last thing I had from -- I know I had it,  
23 but I can't pinpoint it. The last time I  
24 got -- the last one I have on here was back in  
25 April, but I could check to see. That might --

1 if he can do it on the 11th, then we can put  
 2 Laura on the 8th.  
 3 MR. STREET: Uh-huh.  
 4 MS. SANDERS: So we'd put -- it would  
 5 be Luke this Friday, Laura on Monday, DiCicco  
 6 -- well, Armando and Ms. Amos, if can you do  
 7 them on the same day.  
 8 MR. STREET: Tuesday.  
 9 MS. SANDERS: Yeah. DiCicco on  
 10 Wednesday, and then JB on Thursday, but let me  
 11 just make sure he can do Thursday.  
 12 MR. STREET: And Mr. Ramsey on  
 13 Friday.  
 14 MS. SANDERS: Yeah, you noticed him  
 15 on Friday. I mean, we'll see what the Court  
 16 says. Hopefully they'll rule.  
 17 All right, let's see.  
 18 In fact -- let me see. I don't know  
 19 where that -- I may get -- let me get Lauren to  
 20 -- let me -- if you don't mind, I'm just going  
 21 to call Lauren really quick and ask her to find  
 22 out about JB. That'll be faster than me  
 23 sitting here trying to figure it out and then  
 24 not even --  
 25 MR. STREET: My Lauren?

1 MS. SANDERS: My Lauren.  
 2 MR. STREET: Oh.  
 3 MS. SANDERS: We both have a Lauren,  
 4 so not your Lauren.  
 5 All right, let me just call her really  
 6 quick.  
 7 MR. STREET: Sure.  
 8 MS. SANDERS: And she'll -- that way,  
 9 we can keep going.  
 10 (WHEREUPON, a brief off-the-record  
 11 phone conversation was held.)  
 12 MS. SANDERS: All right, she's going  
 13 to find out. Okay.  
 14 MR. STREET: Okay.  
 15 MS. SANDERS: All right, so we'll  
 16 figure that out. And then Melissa Amos -- I  
 17 told Lauren I'd send you a Zoom link.  
 18 MR. STREET: Uh-huh.  
 19 MS. SANDERS: I may have to go out  
 20 there in person. So if I do, then it's fine.  
 21 Daniel can just sit in on Armando's.  
 22 The timing might be a little weird,  
 23 because she's on Pacific Time, you know.  
 24 MR. STREET: Yeah, I just flew back  
 25 from out there yesterday.

1 MS. SANDERS: What'd you say?  
 2 MR. STREET: I just flew back from  
 3 Los Angeles yesterday.  
 4 MS. SANDERS: Oh, really? You should  
 5 have stayed. You should have stayed.  
 6 So I'll -- right now, she's scheduled for  
 7 10 o'clock, which is noon our time. So maybe  
 8 we should put her later in the afternoon. You  
 9 could maybe do Armando in the morning?  
 10 MR. STREET: Okay. That's fine,  
 11 either way you want to do it. I don't know --  
 12 I need to go back. I'm going to say, like, you  
 13 know, I've been getting ready for these first  
 14 few, I haven't gotten to Armando yet.  
 15 MS. SANDERS: Yeah, yeah.  
 16 MR. STREET: But I believe that I  
 17 asked him a good bit already.  
 18 MS. SANDERS: Yeah, you did. I went  
 19 back and looked at his deposition, and I think  
 20 you covered a lot. That's why I was thinking  
 21 that it would be a good one to double up on.  
 22 MR. STREET: Yeah, I think it will be  
 23 the shorter one of the ones we do.  
 24 MS. SANDERS: Okay, okay. So I'll --  
 25 I'll be in touch with her attorney. I told him

1 as soon as I met with you, I would confirm the  
 2 9th.  
 3 MR. STREET: Uh-huh.  
 4 MS. SANDERS: Let me see if -- he  
 5 might rather come in the afternoon, you know  
 6 what I mean? So like 10 o'clock in LA, I mean,  
 7 if we scheduled her at 1 or 2 o'clock in LA,  
 8 that's -- well, 1 o'clock would be 3 o'clock  
 9 our time. So that would give you quite a bit  
 10 of time to finish with Armando.  
 11 MR. STREET: Yeah, I think that would  
 12 be -- if we started at 9:00 with Armando, that  
 13 day would be plenty of time.  
 14 MS. SANDERS: Yeah, okay.  
 15 All right, so let me check with him on  
 16 that, and that shouldn't be an issue. I can --  
 17 I probably have two hours max. So I think it  
 18 will still be a normal -- you know, a normal  
 19 day. I don't think we'll have to stay late.  
 20 All right, so let me just -- I'll follow  
 21 up with him, and I'll send you an e-mail this  
 22 afternoon and let you know that for sure.  
 23 Then the only other thing, I had reserved  
 24 an hour for the Plaintiff. I need to squeeze  
 25 that in somewhere, but it's really only on



1 hour. It's all I've got. So what day do you  
2 think works best?

3 MR. STREET: I mean, I am -- Lauren  
4 was going to cover that one, but she's -- looks  
5 like -- I'll check with her. Looks like she  
6 may have another deposition in another case  
7 Thursday, but I'm free Thursday.

8 MS. SANDERS: This coming Thursday?

9 MR. STREET: Uh-huh. And then --

10 MS. SANDERS: Okay. Okay. Yeah,  
11 that would be great. You want to just check  
12 with him and...

13 MR. STREET: Yes.

14 MS. SANDERS: Okay. So Thursday, the  
15 4th. Of course, we'll do that by Zoom.

16 MR. STREET: Uh-huh.

17 MS. SANDERS: You know, no reason  
18 to -- for him to come here for that.

19 Okay, so let's see. Okay, perfect.

20 All right, that's all I got to know on  
21 depositions, unless you've got -- that's -- I  
22 think that gets all the ones that we've talked  
23 about. Are there any -- anything else you need  
24 to talk about on depositions?

25 MR. STREET: I mean, there's the rest

1 we want to take, but I don't see how we fit  
2 them in before the 12th. That's why I said we  
3 need to take an --

4 MS. SANDERS: Extension?

5 MR. STREET: Ask the Court for a  
6 little extension.

7 MS. SANDERS: Okay. Just let me know  
8 what you want to do on that.

9 MR. STREET: And if we did do that, I  
10 don't mind, again, putting Ramsey's at the end  
11 of an extension.

12 MS. SANDERS: Yeah.

13 MR. STREET: But I think you guys  
14 would prefer that, so maybe you could -- would  
15 not oppose or join -- even join in my motion.

16 MS. SANDERS: Yeah. I mean, if the  
17 motion is limited to depositions, I think --

18 MR. STREET: It is. We're done with  
19 discovery.

20 MS. SANDERS: Yeah, okay. Just --

21 MR. STREET: And I'll say this:  
22 Unless something comes up in the depositions,  
23 but --

24 MS. SANDERS: Right.

25 MR. STREET: -- I don't know that

1 anything else we could ask for.

2 MS. SANDERS: Well, let me know if  
3 you want to -- like, with this afternoon, let  
4 me know who -- like, how many more you want,  
5 who you plan on taking. I mean, obviously,  
6 I'll consider it --

7 MR. STREET: Okay.

8 MS. SANDERS: -- and we'll see.  
9 We'll just see where that lands.

10 MR. STREET: We've got one we've been  
11 working on, it's just -- it's not our --  
12 unfortunately, our usual kind of motions. It's  
13 one where I just say, we tried, we asked for  
14 dates, they couldn't get the dates we wanted.  
15 Discovery deadline hit, we wanted to do it  
16 after, then we didn't do it after. Now we have  
17 all this time, but we have all these  
18 depositions, both sides want to take them, and  
19 we got documents still coming from the last  
20 order, so...

21 MS. SANDERS: Yeah.

22 MR. STREET: And I don't -- just  
23 these depositions, I don't need very much at  
24 all.

25 MS. SANDERS: Uh-huh.

1 MR. STREET: So I've got the --  
2 Lauren and I have a jury trial May 15th --

3 MS. SANDERS: Okay.

4 MR. STREET: -- in Memphis. And then  
5 I have a -- when is that? That's Brandon. I  
6 have something -- the first week of June, I'm  
7 out for the whole week on a case out west we're  
8 part of.

9 MS. SANDERS: Okay.

10 MR. STREET: So I would -- I would --  
11 you know, I -- if Lauren's in that hearing,  
12 that doesn't affect me. Like, in the middle of  
13 June --

14 MS. SANDERS: Uh-huh.

15 MR. STREET: -- is what we'd ask for,  
16 so a month.

17 MS. SANDERS: All right.

18 MR. STREET: And then that gives them  
19 the -- is it 120 or 150 days she likes?

20 MS. SANDERS: 120.

21 MR. STREET: Okay, that should --  
22 then that's plenty, and my timing with these is  
23 150, so...

24 MS. SANDERS: Uh-huh. Summary  
25 judgment will be due --

1 MR. STREET: Like in August sometime.  
 2 MS. SANDERS: Or July, yeah.  
 3 Yeah, I think the -- I think the thing to  
 4 do is just let me know, like, who you still  
 5 need to schedule.  
 6 MR. STREET: It would be on that list  
 7 I sent already.  
 8 MS. SANDERS: Okay.  
 9 MR. STREET: And I think we struck a  
 10 couple and we're keeping those people struck,  
 11 and --  
 12 MS. SANDERS: Okay. What about the  
 13 30(b)(6)? You mentioned the 30(b)(6). Do you  
 14 want to do -- do you want to send me some  
 15 topics or at least -- we talked about a  
 16 30(b)(6) for the HRC, but I don't know if you  
 17 meant that or a continuation of the 30(b)(6).  
 18 MR. STREET: No, I meant -- I was  
 19 thinking a new one regarding -- what -- what  
 20 did the Judge call it? The best workplace  
 21 discovery.  
 22 MS. SANDERS: Oh, okay.  
 23 MR. STREET: I think that would be a  
 24 topic, and instead of naming people  
 25 individually because --

1 MS. SANDERS: Do a 30(b)(6) on it?  
 2 MR. STREET: Yes.  
 3 MS. SANDERS: Yeah.  
 4 MR. STREET: That might just be  
 5 easier for everyone.  
 6 MS. SANDERS: I think that Armando's  
 7 included that.  
 8 MR. STREET: Okay.  
 9 MS. SANDERS: But you can -- I'll go  
 10 back and look.  
 11 MR. STREET: Okay.  
 12 MS. SANDERS: I'll look at the topics  
 13 you already included.  
 14 MR. STREET: I think we can be more  
 15 specific at the time anyway, so...  
 16 MS. SANDERS: Okay. All right. If  
 17 you want to just let me know what the 30(b)(6)  
 18 topics are --  
 19 MR. STREET: Uh-huh.  
 20 MS. SANDERS: I guess we should  
 21 figure out the extension first.  
 22 MR. STREET: Right.  
 23 MS. SANDERS: Okay. Yeah, I'll look  
 24 at the calendar, too. And I'm not inclined to  
 25 agree to any extension on discovery because

1 we -- we obviously want discovery to end.  
 2 However, the Judge's last -- in response  
 3 to our motion to ascertain status, he did  
 4 indicate he was going to rule soon. I don't  
 5 know what "soon" is.  
 6 MR. STREET: Oh, did he -- I didn't  
 7 see, I was gone. Did he --  
 8 MS. SANDERS: Yeah, he -- he -- he  
 9 responded to the motion to ascertain status,  
 10 but he didn't rule. He said that he's aware,  
 11 that he plans to rule soon, but, you know, he's  
 12 got an enormous criminal docket and 350 civil  
 13 cases and he's been in the middle of a  
 14 one-month jury trial.  
 15 So that was the -- the status was he's  
 16 been really busy, so -- but he did indicate  
 17 that he intends to rule. So given that, an  
 18 extension might make sense.  
 19 MR. STREET: All right. And if you  
 20 guys want to agree to the extension, then we  
 21 can agree to move Mr. Ramsey's deposition.  
 22 MS. SANDERS: Okay. All right.  
 23 Well, let me -- let me look at that, and I  
 24 will -- I'll talk to my client. I'll send you  
 25 an e-mail.

1 MR. STREET: All right. But we have  
 2 to -- I mean, it has to come down as an order,  
 3 you know what I'm saying?  
 4 MS. SANDERS: I know.  
 5 MR. STREET: I can't strike it just  
 6 as a floating motion --  
 7 MS. SANDERS: Yeah, I know.  
 8 MR. STREET: -- just because of what  
 9 we have to do. And that's not me being a jerk,  
 10 that's just me not being able to...  
 11 MS. SANDERS: No, I don't think  
 12 that -- I don't think we can do anything short  
 13 of her agreeing and ordering it.  
 14 MR. STREET: Yeah.  
 15 MS. SANDERS: So I agree with you.  
 16 MR. STREET: Okay.  
 17 MS. SANDERS: I don't think that -- I  
 18 don't think you and I can agree to extend it --  
 19 MR. STREET: Exactly.  
 20 MS. SANDERS: -- without an order.  
 21 She has been pretty fast to rule, though.  
 22 MR. STREET: She has.  
 23 MS. SANDERS: So I think that it  
 24 won't -- it shouldn't be an issue.  
 25 MR. STREET: And I don't think she'd

1 be surprised by it, either.

2 MS. SANDERS: Yeah.

3 MR. STREET: Based on what she's said  
4 before about, you know, how she basically told  
5 us, I feel like, how she wanted it to be filed.  
6 So I think she expects it to be filed if she's  
7 telling us how she wants it to be filed.

8 MS. SANDERS: What did she say? I  
9 don't remember.

10 MR. STREET: Oh, she just said make  
11 sure you get it in seven days before the  
12 deadline and --

13 MS. SANDERS: Right, that's correct.  
14 Yeah.

15 MR. STREET: So...

16 MS. SANDERS: Okay. Well, I'll give  
17 you an answer today. I'll look -- I'll go look  
18 and at least let you know whether we're going  
19 to oppose it or not, and then you can get it  
20 filed --

21 MR. STREET: Okay.

22 MS. SANDERS: -- well before her  
23 seven days.

24 Okay. Now, on the -- on the sanctions  
25 motion or order, I've gone through and I've

1 looked at the interrogatories, which I -- I  
2 didn't make you a copy. Do you have them? Do  
3 you have -- can you pull them up?

4 MR. STREET: I can pull them up here,  
5 I think so.

6 MS. SANDERS: Okay. So I'm looking  
7 at the original one, and it's Lampo's responses  
8 to Plaintiff's first set of interrogatories, or  
9 you can look at the ones you sent. It doesn't  
10 matter, it's -- because I want to ask you about  
11 the actual interrogatory and not my response,  
12 so whichever one you've got is fine.

13 MR. STREET: That's fine. Is this  
14 Lampo's responses?

15 MS. SANDERS: Uh-huh, yeah.

16 MR. STREET: Okay. Then do you  
17 remember the date on those?

18 MS. SANDERS: Should be sometime  
19 around September 23rd. That's when they were  
20 signed. Let me look at the certificate of  
21 service.

22 Yeah, I sent them to you on  
23 September 23rd.

24 MR. STREET: Okay. I've got them  
25 pulled up.

1 MS. SANDERS: Okay.

2 All right. So when I read her order, I  
3 think what I'm supposed to do is do an  
4 individual -- like, supplement each one  
5 individually that asks for people. So I've  
6 narrowed those down, and I want to make sure  
7 this is -- this is right.

8 So Number 1, I think, is pretty simple.  
9 That one, she asks for the -- or you ask for  
10 the name, address, job title of every person  
11 who provided information in the  
12 interrogatories. I mean, that's easy, right?

13 MR. STREET: Uh-huh.

14 MS. SANDERS: That is what it is,  
15 okay. So that one is -- you know, I don't  
16 think there's a need to supplement that one.

17 Number 2, I think, is the one that you --  
18 this is what I think you filed the sanctions  
19 motion on. And I took her response to  
20 sanctions motion as, like, a motion to compel,  
21 like an order compelling. So I want to make  
22 sure that I'm addressing the right one.

23 So Number 2 says, "Identify each person,"  
24 I'm not going to read the whole thing.

25 MR. STREET: Uh-huh.

1 MS. SANDERS: "Who has knowledge of  
2 relevant facts relating to the subject matter  
3 of the litigation and state in detail the  
4 nature of each person's knowledge." There's  
5 more, but -- so that's Number 2.

6 I just want to go over the other ones,  
7 because I think all the other ones are  
8 answered. 2 is the one that I think is what  
9 the real contention is.

10 Okay, then the next one that asks for  
11 individuals is Number 5. That one is -- I do  
12 want to talk about that one, but I think that  
13 one's pretty straightforward. It says,  
14 "Identify all persons involved in making the  
15 decision to terminate, suspend," I think that's  
16 just a typo, because he wasn't suspended,  
17 "Plaintiff's employment and specifically their  
18 particular actions taken." You know, so that's  
19 a third one, I think he's asking for people.

20 And then I think that's it, but let me  
21 just double-check.

22 Oh, well, we should talk about Number 9.

23 MR. STREET: And Number 7.

24 MS. SANDERS: Okay, did I skip one?  
25 Yeah, to identify the statements.

1 MR. STREET: And who made them.

2 MS. SANDERS: Okay, let me circle  
3 that one.

4 Okay. And then Number 9 is the  
5 investigations.

6 MR. STREET: Yes.

7 MS. SANDERS: Which I think we  
8 have -- I think all that's in there, but I can  
9 put it in the form of an interrogatory  
10 response.

11 And I think that's it. We're asking for  
12 something about individuals. I have a lot of  
13 responses where I include individuals, but I'm  
14 trying to take the supplemental response, fit  
15 it into each one. I think that's what she was  
16 telling me to do.

17 MR. STREET: That's what I think she  
18 was, too.

19 MS. SANDERS: Yeah. So the only one  
20 that I think is -- yeah, we probably do need to  
21 talk about 7, but I think 2. I need to know --  
22 I'd like to talk to you about 2, because if  
23 it's knowledge of relevant facts relating to  
24 the subject matter of the litigation, I don't  
25 know how to -- I don't know how to narrow that

1 down. I mean, that's what I was doing. I was  
2 giving you people that knew about him, his  
3 employment, and I was looking at it from -- JB  
4 Wagner is not a supervisor, but JB Wagner is,  
5 like, kind of like a lead, you know. He was  
6 like a supervisor in training, sort of.

7 MR. STREET: Uh-huh.

8 MS. SANDERS: So he was pretty  
9 familiar with Amos's performance. That's why I  
10 included him. But the rest of them were like  
11 supervisory roles who could impact his  
12 employment.

13 The issue that I'm struggling with is  
14 there's, you know, a lot of allegations in the  
15 complaint. And so, I could narrow it by  
16 looking at the actual counts, but even then, I  
17 don't know -- I mean, honestly, I think anybody  
18 that ever worked at Lampo could have knowledge,  
19 right?

20 So I don't know -- I've done my best to  
21 answer it. It obviously wasn't good enough, so  
22 I need -- I want to make it right, I want to  
23 get it right, and I -- I don't know exactly how  
24 to answer it.

25 So if I'm looking at -- and maybe the

1 thing to do is take the complaint and look at  
2 the counts, like what -- let's start with that.

3 Like some of the stuff in here is where Lampo  
4 is located. I mean, I don't think you want --

5 MR. STREET: No, you're right, I  
6 don't want that.

7 MS. SANDERS: Right. You don't want  
8 people with knowledge of Lampo being an LLC,  
9 right?

10 MR. STREET: Right.

11 MS. SANDERS: So my thought was to  
12 look at the counts, starting with Paragraph  
13 330. The first count is retaliatory discharge.

14 MR. STREET: Let me look at the fact  
15 section.

16 MS. SANDERS: Yeah.

17 MR. STREET: All right, this is  
18 the -- not the amended complaint. Where is  
19 that?

20 MS. SANDERS: Yeah, I think the first  
21 amended complaint is the operative one.

22 MR. STREET: Okay.

23 MS. SANDERS: Because that's the  
24 one -- that's the last one you filed.

25 MR. STREET: This is probably it.

1 MS. SANDERS: It's Document 21 in the  
2 Court's filing system, if that helps. You  
3 filed it on March 4th, '22.

4 MR. STREET: Well, that's -- this is  
5 it. We didn't get the stamp copy. We have the  
6 PDF copy, but it's March.

7 MS. SANDERS: Okay. Because that --  
8 yeah.

9 MR. STREET: It was created March of  
10 '22.

11 MS. SANDERS: Yeah, and it's a --  
12 titled the First Amend Complaint.

13 MR. STREET: Right.

14 I mean, I think all that -- the first two  
15 pages, no, that's --

16 MS. SANDERS: Okay.

17 MR. STREET: -- none of that.

18 The factual allegations, though, I think  
19 that would apply. And that's a lot, I know,  
20 but...

21 MS. SANDERS: Uh-huh. So --

22 MR. STREET: You know, it also -- I  
23 think that's probably going to be a lot of the  
24 same people. Like it may not be a lot of  
25 people, but just the people who have knowledge



1 of a lot of these facts.

2 MS. SANDERS: Uh-huh.

3 So this -- okay, so Kimberly Rudolph, for  
4 example, is listed as the recruiter. She no  
5 longer works for us. I don't -- I've not  
6 talked to her. I don't know if she remembers  
7 Brad Amos. But, I mean, you obviously know  
8 about her, you know who she is.

9 MR. STREET: Uh-huh.

10 MS. SANDERS: I don't know if she  
11 knows anything. So like, how would you --  
12 like, what would your exception be of me on how  
13 to address something like Kim Rudolph?

14 MR. STREET: I mean, if she knows  
15 something about the facts of the case that you  
16 know about --

17 MS. SANDERS: Yeah.

18 MR. STREET: -- then...

19 MS. SANDERS: Yeah, I don't know if  
20 she does. That's the thing, like, nobody's  
21 talked to her.

22 MR. STREET: Uh-huh.

23 I mean, I would say list them and be  
24 careful, you know, and put them on there if  
25 they may not, than not include them and have

1 them do it, but -- and -- does that make sense?

2 I know that was blah, blah, blah, but...

3 MS. SANDERS: Well, and I think this  
4 is why we got wrapped around the axle on  
5 investigation, which the Judge called us out on  
6 that, but -- but we had different questions.  
7 Like, there was -- one question was about who  
8 do we investigate -- like, who do we interview,  
9 right?

10 MR. STREET: Uh-huh.

11 MS. SANDERS: The other question was  
12 whose got knowledge. I don't think we were off  
13 base in talking about both of those things,  
14 because obviously whoever we interview, we know  
15 if they've got knowledge or not, right?

16 So I don't think those two things -- the  
17 Judge, primarily me, came down on me for  
18 conflating those things. You've asked both of  
19 those questions, and I think they're relevant  
20 because if I haven't -- if we haven't  
21 interviewed someone or talked to them, we don't  
22 know if they know anything.

23 MR. STREET: Uh-huh.

24 MS. SANDERS: So that's what I'm  
25 trying to figure out, is what -- I mean,

1 Kimberly Rudolph, I agree that she -- that's  
2 the other thing. See, we've never filed an  
3 answer because we filed a motion to dismiss.

4 MR. STREET: Uh-huh.

5 MS. SANDERS: If I had filed an  
6 answer in this case, you would know that I --  
7 I'd probably admit Number 20, Ms. Rudolph had  
8 phone interviews with Plaintiff. Do you see  
9 what I mean?

10 MR. STREET: Uh-huh.

11 MS. SANDERS: So I can tell by those  
12 documents I gave you on the interview and  
13 recruiting, she clearly talked to him.

14 MR. STREET: I think, you know, if  
15 you would list them, I think the best thing to  
16 do would be to list them all and then I just  
17 show my client and say -- because he was -- if  
18 the client would inform me that all she did was  
19 interviewed me on the phone the first time --

20 MS. SANDERS: Uh-huh.

21 MR. STREET: -- you know, then --

22 MS. SANDERS: Yeah.

23 MR. STREET: Then that's it, so...

24 MS. SANDERS: Because you had  
25 actually -- she was one of the first ones that

1 you identified as somebody to depose.

2 MR. STREET: Okay.

3 MS. SANDERS: All right, so let's  
4 keep going.

5 I can -- because I do acknowledge that  
6 she was a recruiter, the notes show that she  
7 did talk to Brad Amos. Does she remember him,  
8 I don't know. So I would just have to qualify  
9 that --

10 MR. STREET: Okay.

11 MS. SANDERS: -- you know.

12 Okay, so then we get into DiCicco, that  
13 makes sense. I'm on Page 4, starting with 26.

14 Okay. So here he's talking about  
15 interviews with various people through a 60-day  
16 process. Everybody that interviewed him, those  
17 notes would be in the Jobvite, which that was  
18 produced -- let me pull up my own internal  
19 production log.

20 MR. STREET: Uh-huh.

21 MS. SANDERS: Then I can give you  
22 some context of when stuff was actually  
23 produced.

24 So -- let's see. Sorry, I had the wrong  
25 thing. Okay.

1 Okay. All right, so early on, I provided  
2 you with -- Jobvite is the -- that's what they  
3 track other applicant data, right? Their  
4 interview process is done in Jobvite.

5 Okay, so you've got some of those in the  
6 initial disclosures. What I realized in --  
7 later on was that there were multiple tabs in  
8 Jobvite, so you didn't have every document and  
9 every tab. I didn't know that until I started  
10 looking at Jobvite, and I realized stuff was  
11 missing.

12 So on October 24th -- yeah, 24th of  
13 October, that's when I gave you the complete  
14 Jobvite, so you had all the evaluations and  
15 notes. So you would have seen in the initial  
16 disclosures and then in October 20 -- the --  
17 October 24th everybody that interviewed him.  
18 They would have made notes in Jobvite.

19 MR. STREET: Uh-huh.

20 MS. SANDERS: So presumably, those  
21 people at some point knew something about Brad  
22 Amos.

23 MR. STREET: Uh-huh.

24 MS. SANDERS: The only ones that I  
25 know about are those that I've disclosed, like

1 DiCicco. I think Laura Johnson, Luke LeFevre.  
2 I don't think JB Wagner interviewed him, but  
3 those three did.

4 So there could be other people in that  
5 Jobvite. Like, for example, you had -- I think  
6 it was Larry -- I don't know his name, maybe  
7 Anderson?

8 MR. STREET: Larry Anderson.

9 MS. SANDERS: Yeah. That's somebody  
10 you identified early on as somebody you wanted  
11 to depose. He, I'm sure, interviewed your  
12 client. So do you want -- do you want me to  
13 distinguish between the ones who are in Jobvite  
14 who may have interviewed him that I don't know  
15 if they know anything and then those that did  
16 interview him that I know know something? Do  
17 you see what I mean?

18 MR. STREET: Yeah. Yeah, I mean --  
19 you know, I mean, as long as it is -- the  
20 information provided by each person lets me  
21 look at it and see, well, does this person have  
22 something that's worth deposing them over or  
23 not --

24 MS. SANDERS: Yeah.

25 MR. STREET: -- then that's fine.

1 MS. SANDERS: Okay. So I can  
2 reference -- I'll reference the people in  
3 Jobvite, because whoever's in there presumably  
4 interviewed him.

5 MR. STREET: Right.

6 MS. SANDERS: Right?

7 But I don't -- I don't know if they  
8 remember him, right?

9 Okay. All right. Okay. I think that  
10 gets us through most of that page. Yeah,  
11 because all of Page 4 is about his interview.

12 Okay, take a look at Number 40.  
13 "Plaintiff, through his own interview research,  
14 had also found certain reviews and local  
15 community" -- or, I'm sorry, "commentary  
16 indicating that Lampo was more cult-like than  
17 Christian."

18 MR. STREET: Uh-huh.

19 MS. SANDERS: I mean, I don't -- I  
20 don't -- I don't know of anyone who would --

21 MR. STREET: I think that's talking  
22 about something Plaintiff did.

23 MS. SANDERS: Yeah. Okay.

24 MR. STREET: So it would be a  
25 question for him.

1 MS. SANDERS: Okay.

2 MR. STREET: Maybe not for one of  
3 your people.

4 MS. SANDERS: Yeah, okay.

5 All right. Again, you have Larry  
6 Anderson listed in here. Larry Anderson, by  
7 the way, no longer works at Ramsey. So I -- I  
8 don't know what he does and doesn't know.

9 MR. STREET: So is it okay for me to  
10 put in this motion today that -- after our  
11 talk, what the Judge wanted us to have, that it  
12 looks like some of the people who you may  
13 supplement with are people who, if we want to  
14 depose, it's not as simple as just calling you  
15 and saying, have them get there. I have to  
16 subpoena them, find a date. Do you know what I  
17 mean? Like, it's not a party to the lawsuit.

18 MS. SANDERS: Yeah. Some of them,  
19 though, like -- so the first time you wanted to  
20 depose Larry Anderson -- I can get in touch  
21 with Larry. Like, I know where he is. We  
22 reached out to him to schedule it.

23 MR. STREET: Uh-huh.

24 MS. SANDERS: So I don't think it's  
25 as simple as saying, like -- I mean, some of

1 them, like Luke LeFevre no longer works there.  
 2 MR. STREET: Right.  
 3 MS. SANDERS: But, I mean, he was an  
 4 operating board member. He's easy to connect  
 5 with, you see what I mean?  
 6 MR. STREET: Right, but some of them  
 7 may not be.  
 8 MS. SANDERS: That's true, yeah.  
 9 MR. STREET: Okay. So I'll just say  
 10 -- that's all I'm saying. I'm not saying they  
 11 all are going to be like that, but --  
 12 MS. SANDERS: Yeah.  
 13 MR. STREET: -- some of them may  
 14 issuance of subpoena, et cetera.  
 15 MS. SANDERS: Yeah. I think -- I  
 16 think most of them will prefer to cooperate,  
 17 you know, rather than be subpoenaed --  
 18 MR. STREET: Yeah.  
 19 MS. SANDERS: -- but I can't speak  
 20 for them.  
 21 The only ones I can speak for are Larry  
 22 Anderson and -- and Kimberly Rudolph, who --  
 23 the -- the two that you -- the two that you  
 24 early on wanted to depose. I reached out to  
 25 both of them, was able to find them, they were

1 cooperative. So I don't think, like, those two  
 2 are an issue.  
 3 MR. STREET: Okay.  
 4 MS. SANDERS: I don't know -- you  
 5 know, I don't know about who else might be on  
 6 here.  
 7 All right. Okay, so I think then we get  
 8 down to 47. So 47, I think we're moving into a  
 9 new -- we've moving into now where Defendant  
 10 Ramsey said on the radio that Lampo had been  
 11 voted the best place to work. I don't know how  
 12 to list people who know that.  
 13 MR. STREET: That's going to be --  
 14 that's fine.  
 15 MS. SANDERS: Okay.  
 16 MR. STREET: I get that.  
 17 MS. SANDERS: Okay.  
 18 MR. STREET: Everyone there probably  
 19 realized that.  
 20 MS. SANDERS: Yeah. I mean, that's  
 21 it. Like, I think there's -- I'd have to give  
 22 you a roster of everybody that worked there,  
 23 so...  
 24 MR. STREET: I understand.  
 25 MS. SANDERS: Okay. So then, let's

1 see, back on Page 6, we're getting back into  
 2 the interview process.  
 3 Okay, 51, Lampo made an offer to  
 4 Plaintiff for an annual salary of 90,000 with a  
 5 \$10,000 relocation bonus. I don't -- I think  
 6 that Armando in HR -- I don't know if Armando  
 7 was the one who approved that. Nobody knows.  
 8 We just know that he got that offer. You know  
 9 what I mean? So I -- I don't think --  
 10 MR. STREET: I mean, that's not a  
 11 disputed fact. My client testified to it.  
 12 MS. SANDERS: No, that's not a  
 13 dispute.  
 14 MR. STREET: Then you don't -- that's  
 15 fine.  
 16 MS. SANDERS: Yeah.  
 17 Well, actually, 90,000 might be off, but  
 18 it doesn't matter.  
 19 MR. STREET: Uh-huh.  
 20 MS. SANDERS: I mean, I think -- if I  
 21 recall, I'm not sure he made 90. I thought he  
 22 made 90 total. Doesn't matter, the point is  
 23 there's going to be an offer in there that says  
 24 how much he got.  
 25 MR. STREET: Right.

1 MS. SANDERS: I just don't know who  
 2 offered that offer. See what I mean? But  
 3 you've got Armando, who's the head of HR.  
 4 MR. STREET: That's fine with that  
 5 one.  
 6 MS. SANDERS: All right. 53, 54,  
 7 okay, the on-boarding process. On 54, looks  
 8 like for the next several ones you're talking  
 9 about the on-boarding process. Again, we don't  
 10 know who on-boarded him, so I don't know who to  
 11 list there.  
 12 Armando, again, is the head of HR. He  
 13 can tell you about the on-boarding process, but  
 14 nobody knows exactly who was there to on-board  
 15 him.  
 16 MR. STREET: Uh-huh. Okay.  
 17 MS. SANDERS: If I -- actually, there  
 18 could be something in the documents that say  
 19 that. I haven't read all the e-mails, but  
 20 there might be something in the e-mails, like  
 21 in the first e-mails with him, right when he  
 22 started, there might be something about  
 23 on-boarding. But based on my investigation, I  
 24 don't know who on-boarded him, so what -- what  
 25 do you want me to tell you there?



1 MR. STREET: Just whatever you can  
2 find out.  
3 MS. SANDERS: Okay. Like, I would  
4 defer to HR.  
5 Okay. Then like 57, he said it was an  
6 indoctrination process. I mean, I think  
7 offering Armando -- Armando is in charge of the  
8 on-boarding, so I think we're good on that.  
9 And he was in charge of it at this time, too,  
10 so...

11 The Ramsey way, I'm not sure what that  
12 means. So I don't know who to offer -- I  
13 don't -- I don't know who has knowledge of  
14 this. Again, this is the kind of thing that  
15 you could ask everybody that works there.

16 MR. STREET: I think, you know, in  
17 the complaint, it's written in the Plaintiff's  
18 voice. When he says things like that, it's  
19 from the Plaintiff.

20 MS. SANDERS: Okay. All right.

21 MR. STREET: I mean, I feel sure  
22 Mr. -- Defendant Ramsey does not agree with our  
23 claim that the Ramsey way encourages expressing  
24 praise for Mr. Ramsey constantly.

25 MS. SANDERS: No, right.

1 MR. STREET: So that's an opinion of  
2 the Plaintiff in this matter.

3 MS. SANDERS: Yeah, I don't have  
4 anybody that would -- has knowledge of that,  
5 right?

6 MR. STREET: So, I mean, that's clear  
7 to me if it's just something that is written,  
8 like, in the Plaintiff's voice, something he  
9 says that this is the way he thinks it is and  
10 what he feels it is, then that's something we  
11 got to prove.

12 MS. SANDERS: Yeah.

13 MR. STREET: I get it, but our guy is  
14 the witness for those.

15 MS. SANDERS: Okay. So I think --  
16 and I think most of this is the on-boarding  
17 process, you know. So that -- I think giving  
18 you Armando was the best I could do because he  
19 can tell you what the on-boarding process is.

20 I have asked if we know specifically  
21 about Brad Amos's on-boarding. There were a  
22 number of people on-boarded at the same time,  
23 so what I've been trying to do is figure out  
24 who was on-boarded with him, because that'd  
25 maybe give me some clues as to who on-boarded

1 him, but I don't think they have a record of  
2 it.

3 Like, I think the way they on-board is  
4 whoever is available to meet and greet, you  
5 know, HR leads the whole thing, so there's  
6 probably going to be people from the operating  
7 board that come in. Dave Ramsey probably comes  
8 in and says, welcome to Ramsey, I -- I don't  
9 know, but it's -- it's a general format that  
10 they follow, but I don't know that we have a  
11 list of exactly who on-boarded him, so I think  
12 giving you Armando is the best I can do on  
13 that.

14 But if I figure that out or if you see it  
15 in the documents --

16 MR. STREET: Or if Armando tells me  
17 someone.

18 MS. SANDERS: Right, exactly. If  
19 Armando figures it out between now and when you  
20 depose him, then we'll know that.

21 Okay. 67, Lampo encouraged Plaintiff to  
22 be Facebook friends with all of his coworkers  
23 and supervisors. I'm not sure who that is, so  
24 I don't have anybody to identify.

25 There is an e-mail in 68, one of the

1 e-mails that was produced where Lampo  
2 encouraged Plaintiff's wife -- actually, I  
3 think you produced it. I think it was a social  
4 media message, and that actually -- I think  
5 that message came from Armando Lopez's wife --

6 MR. STREET: Okay.

7 MS. SANDERS: -- who -- but I  
8 don't -- I mean, she doesn't work for us, so I  
9 don't know if she has any knowledge of  
10 Ms. Amos. I don't -- I don't know if she knows  
11 that, but I do think you produced, like, a  
12 social media message.

13 So if it's not somebody that's acting on  
14 behalf of Lampo or that I haven't interviewed  
15 and we haven't interviewed, but you see it in  
16 the documents, is that something you want me to  
17 list?

18 MR. STREET: I mean, if you know  
19 about it, you know, I...

20 MS. SANDERS: Yeah. Okay. Yeah, I  
21 don't know -- I don't know that. I think you  
22 produced it, because I think it was a social  
23 media message. Okay.

24 MR. STREET: And I don't mind, like I  
25 said, if you want to -- you know, I know



1 there's a part of the motion that says, you  
 2 know, you can't generally point to all the  
 3 documents, but if you do point to some  
 4 documents --  
 5 MS. SANDERS: Yeah.  
 6 MR. STREET: -- specifically by Bates  
 7 stamp number, then that's fine with me.  
 8 MS. SANDERS: Yeah, because I -- I  
 9 mean, I have a log of everything produced.  
 10 MR. STREET: Yeah. I'm just  
 11 saying --  
 12 MS. SANDERS: The only time --  
 13 MR. STREET: I'm just saying when you  
 14 produce your response --  
 15 MS. SANDERS: Yeah.  
 16 MR. STREET: -- don't just say it's  
 17 in --  
 18 MS. SANDERS: The documents.  
 19 MR. STREET: -- yeah, Documents  
 20 Number 21,000 to 48,000.  
 21 MS. SANDERS: Uh-huh.  
 22 MR. STREET: You know, say it's on  
 23 this, this, this or this --  
 24 MS. SANDERS: Yeah, I should --  
 25 MR. STREET: -- or reasonable ranges,

1 and that's fine.  
 2 MS. SANDERS: I should be able to do  
 3 that pretty well. The -- there was a stack of  
 4 documents that we didn't review -- we reviewed  
 5 it only for privilege, just because of time  
 6 constraints, but I think we've reviewed it  
 7 since then, so I'll go back and I can look at  
 8 that.  
 9 All right, let's keep going. I think we  
 10 don't -- we talked about the Lampo ladies on  
 11 Page 8.  
 12 Okay. All right, getting down to 74  
 13 where it says, "Plaintiff cut a trailer for  
 14 Lampo's new major podcast Borrowed Future." In  
 15 the documents, you'll see -- I know that -- and  
 16 they're going to be in several places. I don't  
 17 know if you recall this, but literally, I think  
 18 it was on the last day that we had to produce  
 19 the set that we were required to produce in the  
 20 motion to compel.  
 21 I had our vendor do a sweep, just to make  
 22 sure nothing got missed, because it was -- it  
 23 was a large volume and you're almost always  
 24 going to have something that didn't get  
 25 captured. There weren't very many, but there

1 were a few pages. And in a couple of those  
 2 pages, you'll see, like, David DiCicco with  
 3 kind of like a work plan.  
 4 MR. STREET: Uh-huh.  
 5 MS. SANDERS: And it shows people who  
 6 were working on the project. I don't know if  
 7 those people know anything about Brad's  
 8 trailer. I don't know about that, but I can  
 9 point you to those documents that DiCicco has  
 10 which shows the workflow.  
 11 MR. STREET: Uh-huh.  
 12 MS. SANDERS: Do you see what I mean?  
 13 MR. STREET: Uh-huh.  
 14 MS. SANDERS: I've not talked to any  
 15 of those people other than DiCicco, but that  
 16 seems to me to be a response, like, when you're  
 17 wanting to know the technical -- like the  
 18 specific, oh, when you say in here the specific  
 19 things related to a trailer, I think those  
 20 DiCicco workflows are the best.  
 21 And I don't even know the people that are  
 22 listed in there, but you can at least see the  
 23 people that are listed in there, and Brad  
 24 presumably knows those people, right?  
 25 MR. STREET: Right.

1 MS. SANDERS: Because he was working  
 2 with them. He might have listed some of them,  
 3 but I think that's the best source for who  
 4 would know about the trailer or the  
 5 documentary.  
 6 MR. STREET: Okay.  
 7 MS. SANDERS: Does that make sense?  
 8 MR. STREET: Uh-huh.  
 9 MS. SANDERS: Because I don't want to  
 10 list everybody that work in his department  
 11 because they probably have nothing to do with  
 12 the trailer or the documentary. Do you see  
 13 what I mean?  
 14 MR. STREET: Yeah.  
 15 MS. SANDERS: Plus, he knows who he  
 16 worked with. So -- all right.  
 17 And the reason I pointed out that last  
 18 set is because there are so few in there, like,  
 19 if you pull up the very last set I sent to you,  
 20 which I think is Volume 11 -- let me make sure.  
 21 Yeah, Volume 11 was the sweep to make sure that  
 22 all -- all documents marked responsive got  
 23 pulled. I think some of them -- I think most  
 24 of them are probably duplicates, but that's a  
 25 good place to look for those workflows, because

1 there's less than 100 documents in that set.

2 Do you see what I mean?

3 MR. STREET: Uh-huh.

4 MS. SANDERS: And you'll see them,  
5 they're very -- they're distinct because it'll  
6 be an e-mail with David DiCicco, and in the  
7 middle it will be like a chart. There's, I  
8 think, several more of those, but that's the  
9 easiest place to find them, if that makes  
10 sense.

11 Okay. Okay, so there's -- there's some  
12 allegations about his trailer being linked by  
13 Lampo. I've looked into that, and I don't -- I  
14 can't find anything on that. So I think the  
15 best source for that is probably -- you've  
16 already got them -- Luke, Laura, they're the  
17 ones that are going to know that.

18 MR. STREET: Uh-huh.

19 MS. SANDERS: So I can't come up with  
20 anybody else that knows that.

21 On 81 where you say, provided assistance  
22 to the video team, whether Amos provided  
23 assistance to the video team, that -- again,  
24 I -- something like that is pretty vague.  
25 Like, I don't know who the video team is, but I

1 think JB Wagner and DiCicco -- maybe not  
2 DiCicco, but JB Wagner -- DiCicco was pretty  
3 focussed on the documentary, right, so he's not  
4 going to know --

5 MR. STREET: Right.

6 MS. SANDERS: -- much about Amos  
7 beyond that.

8 JB Wagner wasn't a supervisor but knows  
9 probably more about his bigger picture, and  
10 certainly Laura Johnson does. So that's -- I  
11 don't -- I don't know anybody other than that  
12 on there, whether he provided assistance to the  
13 video team, because I'm not sure who the video  
14 team is.

15 MR. STREET: Okay.

16 MS. SANDERS: Okay, then --

17 MR. STREET: What paragraph was that  
18 again? I'm sorry.

19 MS. SANDERS: 81.

20 MR. STREET: Thanks.

21 MS. SANDERS: Okay, so then on Page  
22 9, we're talking about -- here you're talking  
23 mostly about -- well, half of that, going  
24 through 87, 82 through 87, it's talking about,  
25 like, his work performance.

1 Again, I've identified the people who  
2 could do something about his work performance.  
3 His coworkers that might know about his work  
4 performance, I don't know that. I don't know  
5 who they are. I'm assuming he does, but are  
6 you looking for that? Are you looking for a  
7 list of his coworkers?

8 MR. STREET: Yes, I would think  
9 that...

10 MS. SANDERS: Okay. Again, I have no  
11 idea if they have knowledge.

12 MR. STREET: Let me see, you're  
13 talking about 82 --

14 MS. SANDERS: To 87.

15 And here, like, for example, he came in  
16 early, aided other teams.

17 MR. STREET: I think if you know  
18 something that disputes what he claims here --

19 MS. SANDERS: Yeah.

20 MR. STREET: -- if there are  
21 witnesses who dispute that, then they should be  
22 identified, but otherwise --

23 MS. SANDERS: Yeah.

24 MR. STREET: -- again, I think this  
25 is my client speaking in his voice.

1 MS. SANDERS: Okay, got it.

2 Yeah, I think I've given you everybody on  
3 that. I mean, again, the only people I know of  
4 that know that are the people -- other than JB  
5 Wagner, the people who were actually  
6 responsible for him. JB observed him, so he is  
7 going to be -- he's going to fit into this  
8 category.

9 MR. STREET: Uh-huh.

10 MS. SANDERS: All right. So looking  
11 at -- I think we're good on the rest of that.  
12 I mean, you've got Armando.

13 Oh, here where it says they required  
14 him -- 93, they required employees to identify  
15 very specific personal issues in their personal  
16 lives, including any issues with their  
17 marriages. I'm not sure who you're talking  
18 about there.

19 MR. STREET: I don't remember if you  
20 asked him in his deposition or not, but...

21 MS. SANDERS: I think I did.

22 MR. STREET: I don't remember what he  
23 said, but whatever he said is who it is.

24 MS. SANDERS: Yeah. Yeah. So he  
25 talked about Laura Johnson with him.

1 MR. STREET: Okay.  
 2 MS. SANDERS: I don't think he  
 3 referenced anyone else.  
 4 MR. STREET: Okay.  
 5 MS. SANDERS: I mean, we obviously  
 6 dispute that, but...  
 7 MR. STREET: Yeah.  
 8 MS. SANDERS: You know.  
 9 MR. STREET: And that's why I'm  
 10 saying I feel sure -- I don't remember, but I  
 11 feel sure it was something you brought up at  
 12 least, so...  
 13 MS. SANDERS: Yeah, okay.  
 14 MR. STREET: You know, if his  
 15 answer's in there, his answer's in there.  
 16 MS. SANDERS: All right. Then like  
 17 95, and this -- the answer to this one will  
 18 affect some of these others, where he says  
 19 Lampo required all its employees to participate  
 20 in weekly one-on-one meetings, I don't -- I  
 21 think you already asked Armando that.  
 22 MR. STREET: Uh-huh.  
 23 MS. SANDERS: But I don't think  
 24 you're asking me every supervisor who conducted  
 25 one-on-one meetings.

1 MR. STREET: No, I think it'll just  
 2 be for my client.  
 3 MS. SANDERS: For him, okay. Okay.  
 4 Okay. All right, then down to 103. So  
 5 this is when he gets into the endorsed local  
 6 provider. Are you wanting information on the  
 7 endorsed local provider beyond the endorsed  
 8 local provider that was -- that he -- that he  
 9 reached out to to help sell his house?  
 10 MR. STREET: I think it would be more  
 11 about how the ELP program works.  
 12 MS. SANDERS: Okay. Okay. All  
 13 right.  
 14 All right, moving on to Page 11. This is  
 15 going to go a lot faster now that we've, you  
 16 know, had a few of these.  
 17 MR. STREET: Yeah.  
 18 MS. SANDERS: I think we're good on  
 19 11.  
 20 Page 12. Okay, so, for example, 121,  
 21 "Throughout early spring of 2020, the spread of  
 22 Coronavirus/COVID-19 became worldwide news and  
 23 the concern of many American citizens." I  
 24 don't think you're asking me to identify  
 25 everybody that knows that.

1 MR. STREET: I'm not.  
 2 MS. SANDERS: Okay. All right.  
 3 That's it on that page.  
 4 Okay, now go down to Page 13. Okay, like  
 5 on 137, "Specifically in a 900-person meeting,  
 6 Mr. Ramsey stated that fear of working in the  
 7 office because of COVID demonstrated a weakness  
 8 of spirit." We don't think anyone has  
 9 knowledge of that, but in the 900-person  
 10 meeting, you're not asking for like --  
 11 MR. STREET: 900 people?  
 12 MS. SANDERS: Right.  
 13 MR. STREET: No.  
 14 MS. SANDERS: Okay. Because that  
 15 would be -- I mean, it would be the employee  
 16 roster, but that doesn't seem -- that doesn't  
 17 seem to make sense; although, you know...  
 18 All right. So then -- okay. So 140,  
 19 "Lampo was controlled by Mr. Ramsey. To an  
 20 extent, they are alteregos of each other."  
 21 Then 141 where it goes through, like,  
 22 Ramsey and Lampo. I mean, that's something  
 23 that we obviously dispute, but I don't know who  
 24 would have knowledge of that.  
 25 MR. STREET: Mr. Ramsey.

1 MS. SANDERS: Well, there's also the  
 2 operating board.  
 3 MR. STREET: Uh-huh.  
 4 MS. SANDERS: And you've already got  
 5 Luke LeFevre, so you have Armando, Luke.  
 6 MR. STREET: Yeah. I mean, you could  
 7 list these folks, but we're still only limited  
 8 to who we can depose, so...  
 9 MS. SANDERS: Yeah.  
 10 Okay. All right. I think that's the  
 11 same throughout.  
 12 146 where his stated beliefs -- Ramsey's  
 13 stated beliefs regarding COVID were amplified  
 14 on his radio show numerous times, obviously we  
 15 don't know who all heard that.  
 16 MR. STREET: Right.  
 17 MS. SANDERS: I'm on Page 15 now. I  
 18 think this one's -- I think this one's pretty  
 19 straightforward. Yeah.  
 20 Okay, Page 16. I think most of them from  
 21 here on out are specific about his termination.  
 22 There is one on here that I'll ask you about.  
 23 182, for example, Governor Lee issued an  
 24 executive order Number 17 directing Tennesseans  
 25 to work from home whenever feasible.

1 MR. STREET: I'm not going to depose  
 2 Governor Lee.  
 3 MS. SANDERS: Okay.  
 4 MR. STREET: Even though the office  
 5 is right across the hall, but no.  
 6 MS. SANDERS: His office is right  
 7 across the hall?  
 8 MR. STREET: They have one there. I  
 9 think that -- you know, these big construction  
 10 projects go down.  
 11 MS. SANDERS: Oh, yeah, yeah.  
 12 MR. STREET: And then they have a --  
 13 there's one at Vanderbilt, and they all have  
 14 the satellite offices, but Lee.  
 15 MS. SANDERS: Right, right.  
 16 MR. STREET: Lee -- what is it, Lee  
 17 Air-Conditioning?  
 18 MS. SANDERS: Oh, Lee Company.  
 19 MR. STREET: Lee Company, yeah. Lee  
 20 Company was right there.  
 21 MS. SANDERS: Oh, really?  
 22 MR. STREET: Yeah. Never saw the  
 23 governor, though.  
 24 MS. SANDERS: Yeah. I feel like he's  
 25 not in the day-to-day of the Lee Company.

1 Okay, let's see.  
 2 Okay, like 186, in the edit bay, five  
 3 people were crammed into a small space with a  
 4 party-like attitude. I don't know who those  
 5 people are. I've tried to find out, I don't  
 6 know.  
 7 MR. STREET: If you don't know, you  
 8 can't list them.  
 9 MS. SANDERS: Okay.  
 10 Okay, I'm on Page 19. Okay, 19's easy.  
 11 20, I think 20's the same. Yeah.  
 12 21. Okay, on 226, this is just  
 13 clarification, I think 226, when it says,  
 14 "Plaintiff was informed that he had not been  
 15 on-boarded correctly," I think that's  
 16 attributed to Laura Johnson.  
 17 MR. STREET: Yes.  
 18 MS. SANDERS: Okay.  
 19 All right, now I'm on Page 22.  
 20 Okay, 23. On 23, you're talking about  
 21 meetings. I think you're talking about  
 22 one-on-ones with Laura Johnson. That's what  
 23 it -- I think that's -- you know, when you do a  
 24 numbered complaint, sometimes it's not clear in  
 25 each allegation.

1 MR. STREET: Right.  
 2 MS. SANDERS: But I think these are  
 3 all about the one-on-ones with Laura Johnson.  
 4 If they're about anyone else, you know, any  
 5 one-on-one with anyone other than Laura --  
 6 MR. STREET: Right.  
 7 MS. SANDERS: We don't think there  
 8 were any others, other than -- he did have  
 9 one-on-ones with JB Wagner.  
 10 MR. STREET: I'll ask him today.  
 11 MS. SANDERS: Okay, I think that's  
 12 what that is, but just let me know.  
 13 MR. STREET: Okay.  
 14 MS. SANDERS: Okay, 24. 250,  
 15 allegation 250, I don't -- I don't know Shane  
 16 Emerson. I don't know if he still works at  
 17 Ramsey. So I don't know anybody with knowledge  
 18 of this.  
 19 If you're asking me for -- if there's a  
 20 staff meeting for the sole purpose of  
 21 apologizing, I've given you audios of all the  
 22 staff meetings, but I didn't listen to all of  
 23 them.  
 24 MR. STREET: Okay.  
 25 MS. SANDERS: So I feel like I can't

1 really direct you to one, but I don't -- I  
 2 don't know what this incident is. But you do  
 3 have an audio of every staff meeting that was  
 4 there -- that -- that happened while he was  
 5 there and then before he got there and after he  
 6 got there, because you got them for that  
 7 two-year period. Again, I didn't listen to  
 8 them all, but...  
 9 MR. STREET: Okay.  
 10 MS. SANDERS: The staff meetings,  
 11 you've also got the agendas on those.  
 12 MR. STREET: Yeah.  
 13 MS. SANDERS: There's no agenda for  
 14 the devotionals. So you've got them, you've  
 15 got the audios, but you don't have -- there is  
 16 no agendas for those.  
 17 MR. STREET: Okay.  
 18 MS. SANDERS: So is there anything  
 19 else you're looking for on something like 250,  
 20 other than the audio of the staff meetings?  
 21 MR. STREET: No, not that I can think  
 22 of.  
 23 MS. SANDERS: Okay. Again, I haven't  
 24 listened to all those, so there could be  
 25 something in there, but I don't know.



1 MR. STREET: Yeah, I don't have them  
 2 all memorized, so I could go back and read  
 3 through the summaries.  
 4 MS. SANDERS: Fair enough.  
 5 Okay, 254, "Lampo took adverse employment  
 6 actions against all employees who requested to  
 7 work from home." We obviously dispute that,  
 8 but I think that to the extent there were any  
 9 adverse employment actions, I mean, HR would  
 10 know that, right?  
 11 MR. STREET: Okay.  
 12 MS. SANDERS: So if there's somebody  
 13 in particular you're looking for there, let me  
 14 know; otherwise, I would defer to HR.  
 15 MR. STREET: Okay. And if that's his  
 16 answer, that's the answer.  
 17 MS. SANDERS: Yeah.  
 18 MR. STREET: So, I mean, I don't  
 19 know, you know, what your employees know. I  
 20 mean, I'm not in the position to tell you that  
 21 any better than you are, so...  
 22 MS. SANDERS: Yeah, I don't know  
 23 anything about this 254, but adverse employment  
 24 actions, I know HR would know that, right,  
 25 because they keep a record of that.

1 MR. STREET: Right.  
 2 MS. SANDERS: So like, if he wants  
 3 to -- if he has a list of people and he wants  
 4 specific information, I'll get it.  
 5 MR. STREET: Uh-huh.  
 6 MS. SANDERS: But so far, I don't --  
 7 I don't have that, right?  
 8 Okay, Page 25. Again, this is getting  
 9 into, like, conference meetings, staff  
 10 meetings. People who have knowledge of how  
 11 they behaved in staff meetings, that could be a  
 12 thousand people. So I don't know who those  
 13 people are, but are you asking for everybody  
 14 that might have attended a conference meeting?  
 15 If so, I just need to know what conference  
 16 you --  
 17 MR. STREET: What number are you  
 18 talking about again? I'm sorry.  
 19 MS. SANDERS: I'm on Page 25. It's  
 20 really 259 through 262 and then also 264. This  
 21 is where he's talking about mass gatherings,  
 22 and technically anybody with knowledge of those  
 23 gatherings would be whoever was there, but I  
 24 don't -- I don't know who was there.  
 25 MR. STREET: I think we're looking

1 for the people who would be implementing policy  
 2 regarding masks and social distance or not --  
 3 or chose not to implement those policies.  
 4 MS. SANDERS: Okay. Yeah, that's  
 5 going to be -- that would be Armando.  
 6 MR. STREET: Okay.  
 7 MS. SANDERS: Okay.  
 8 Okay, now I'm on Page 26. Okay, here you  
 9 list Leo Gonzales and Shane Emerson. I'm  
 10 assuming if you list people by name -- you also  
 11 on 282 listed Daniel Tardy. These are not  
 12 people that I've talked to or people that I  
 13 think have information about Brad Amos. I'm  
 14 assuming if you list them by name, then you  
 15 know who they are.  
 16 MR. STREET: Uh-huh.  
 17 MS. SANDERS: You're not looking for  
 18 me to list who you've got listed in the  
 19 complaint?  
 20 MR. STREET: No, that's fair.  
 21 MS. SANDERS: Okay.  
 22 All right, now I'm on Page 27. I don't  
 23 think there's -- that's fine.  
 24 28 -- all of those are pretty specific.  
 25 28's the same, it's specific conversations

1 between him and Laura Johnson.  
 2 I'm on to Page 29 now. Okay, nothing on  
 3 29.  
 4 On 30. Okay, Page 31 -- oh no, I'm  
 5 sorry, Page 30, the bottom of 324, "Defendants  
 6 have been publicly criticized by many sources  
 7 for their anti-mask position and their aversion  
 8 to social distancing."  
 9 Do you -- are you asking me to list  
 10 somebody that has knowledge of that, or is  
 11 that --  
 12 MR. STREET: If they do, if you have  
 13 someone.  
 14 MS. SANDERS: Yeah, the publicly  
 15 criticized, though, like, that's pretty broad.  
 16 I don't know -- like, if there was an  
 17 article -- I think you attached some articles  
 18 to your complaint, but I didn't -- I didn't  
 19 copy those. I didn't print those out. I think  
 20 you, like, had a SEEN article maybe.  
 21 MR. STREET: Let's see, probably  
 22 not -- we would have footnoted it, but -- and  
 23 I'm not saying that's not something I provided  
 24 since. But yeah, I mean, if it's someone there  
 25 at -- who works for the Defendant, I'm not

1 asking for -- I can agree not to ask for  
2 people -- reporters, random people.

3 MS. SANDERS: Yeah.

4 MR. STREET: You know, but if it was  
5 an employee or ex-employee...

6 MS. SANDERS: I would say most  
7 people -- like, if it was in the news, most  
8 people saw it, or if it was on Facebook,  
9 somebody criticized on Facebook.

10 MR. STREET: Right.

11 MS. SANDERS: There's no way for me  
12 to know --

13 MR. STREET: Who'd know about -- I'm  
14 not asking who knew about it, but maybe the  
15 people who did publicly criticize, if it's  
16 not...

17 MS. SANDERS: Yeah. Yeah.

18 MR. STREET: And it's not -- you  
19 know, I'm talking people at the company. I'm  
20 not talking about reporters.

21 MS. SANDERS: Right, right, right.

22 So if there were people at the company  
23 that publicly criticized it and we're aware of  
24 it.

25 MR. STREET: Uh-huh.

1 MS. SANDERS: Okay, I don't know  
2 about that, but I'll ask the question.

3 All right. Page 31. Okay, I think  
4 that's pretty much repeat.

5 All right, then we get into the claims,  
6 retaliatory discharge. I think -- should we go  
7 through the claims or do you think if I address  
8 the facts?

9 MR. STREET: I think if you address  
10 the facts --

11 MS. SANDERS: Okay.

12 MR. STREET: -- that this will be  
13 fine. These claims are just our legal claims  
14 based on those facts.

15 MS. SANDERS: Yeah, on the facts.  
16 Okay.

17 All right, so -- so then what I'm going  
18 to do is I'll go back to Interrogatory Number  
19 2, and I don't know that I have anybody new to  
20 list, but I'm going to list who I've already  
21 listed. I will go ahead and include the  
22 recruiter.

23 MR. STREET: Uh-huh.

24 MS. SANDERS: Or I'll -- and I'll  
25 point to Jobvite. Like, anybody using Jobvite

1 interviewed him, you know. So I'll point you  
2 to Jobvite and tell you where to look for that.  
3 And then I'll look to see -- I feel like there  
4 was one more I was going to do like that, but I  
5 got -- I've got a note.

6 All right. So I'll do that on 2, and  
7 that takes care of 2.

8 What was the other one? Yeah, 5. 5's  
9 actually pretty easy because Luke -- okay, let  
10 me ask you about 5.

11 Luke LeFevre made the decision on the  
12 spot, and he is on the operating board, so he  
13 has -- you know, he has power. He has the  
14 authority to do that -- had, he's not there  
15 anymore. So -- but as you can see from the  
16 documents, there were conversations about Brad  
17 isn't going to -- this doesn't seem like it's  
18 working, we're going to give him -- they call  
19 it at Ramsey an emotional firing, which I don't  
20 really know what that means, but I think it  
21 means that we tell you this could happen, what  
22 do you think about it. They're very, like,  
23 relationship oriented.

24 So they had a conversation with him --  
25 the intent was to have a conversation with him

1 on -- and this is all in the documents, so --  
2 but he was terminated on the spot, and that was  
3 solely Luke LeFevre's decision. So I think  
4 that could be part of the issue, is --

5 MR. STREET: What are you -- what  
6 document are you looking at now?

7 MS. SANDERS: Yeah, I'm looking at  
8 Number 5, Interrogatory Number 5.

9 MR. STREET: Oh.

10 MS. SANDERS: On your -- on your --  
11 this is your original one and my original  
12 response.

13 MR. STREET: Oh, okay. All right.

14 Okay. I mean, again, I think if it's  
15 responsive, you can list it out, but if it's --  
16 if you've got a limited number of documents you  
17 could point to, that's fine, too.

18 MS. SANDERS: Yeah. I think that's  
19 what I'll do, because truly the only person  
20 that made the decision was Luke LeFevre, but  
21 that doesn't mean there were other people --  
22 and it's mostly because I think this is a typo  
23 where you said "the decision to terminate or  
24 suspend."

25 MR. STREET: Uh-huh.

1 MS. SANDERS: Well, nobody -- he  
2 wasn't suspended, but what that made me think  
3 is maybe you're looking for more than just the  
4 person who made the decision. To me, that's an  
5 easy answer. It's Luke LeFevre.

6 MR. STREET: Right.

7 MS. SANDERS: He was the only one.  
8 But there were other people who knew about it,  
9 and you can see that in the documents. So I  
10 can point you to those documents --

11 MR. STREET: Uh-huh.

12 MS. SANDERS: -- and then that's...

13 MR. STREET: Right, as long as this  
14 isn't, you know, a short range.

15 MS. SANDERS: It is. It's all going  
16 to be on one day.

17 MR. STREET: Okay.

18 MS. SANDERS: So it's pretty easy to  
19 -- it's pretty easy to look.

20 All right, so let me just do that.

21 Okay. And then Number 7, Number 7, I'm  
22 glad you pointed that one out because that's  
23 where you're asking for statements. So there's  
24 not any voicemail messages, there's nothing --  
25 but there's, as you know, scads of e-mails and

1 there are text messages.

2 So you asked me to identify and describe  
3 all statements between Plaintiff and Defendant  
4 regarding his terminations, concerns about his  
5 job performance or concerns about his personal  
6 life. So you have all these statements.

7 MR. STREET: Uh-huh.

8 MS. SANDERS: Are you asking me to --  
9 what else are you asking me to do?

10 MR. STREET: All right, let me look  
11 at it again. It's...

12 MS. SANDERS: Yeah.

13 MR. STREET: Number 7.

14 MS. SANDERS: And this is a pretty --  
15 by the way, this is going to be a finite group,  
16 right, because it's between Plaintiff and  
17 Lampo, and you have his inbox --

18 MR. STREET: Uh-huh.

19 MS. SANDERS: -- and his outbox, so  
20 you have all this. It's about 6,000  
21 documents -- or -- no, I think it's like 6,000  
22 pages, so it's fewer documents.

23 MR. STREET: Between Plaintiff and  
24 Defendant or Defendant and any other employee  
25 of Defendant.

1 MS. SANDERS: Right, so you've got --  
2 so --

3 MR. STREET: So just should be  
4 statements either made to the Plaintiff or  
5 about the Plaintiff concerning his termination,  
6 his job performance, his personal life. Yep, I  
7 think that one is pretty clear.

8 MS. SANDERS: Well, but this is  
9 between Plaintiff and Defendant.

10 MR. STREET: It says Plaintiff and  
11 Defendant and/or, three people, and/or any  
12 employee of Defendant.

13 MS. SANDERS: So it's not Plaintiff  
14 and/or any -- I mean, you have all this, but --  
15 I mean, you -- you have it all, anyway.

16 MR. STREET: Yeah. If I have it all,  
17 then --

18 MS. SANDERS: Yeah.

19 MR. STREET: -- if you just want to  
20 identify it by page number, that's fine.

21 MS. SANDERS: Well, it's going to be  
22 like 40,000 pages. I mean, it -- like, because  
23 that's what it is. That's -- you know, that's  
24 what it is.

25 MR. STREET: That's not much help,

1 Leslie.

2 MS. SANDERS: Well, I guess what I  
3 can do -- I mean, I don't -- I can give you the  
4 range. I can show you the searches and I can  
5 give you the range of documents --

6 MR. STREET: Okay.

7 MS. SANDERS: -- or those responses.

8 MR. STREET: Just, you know, send me  
9 that, and before -- I won't say, oh no,  
10 ridiculous, Judge, Judge --

11 MS. SANDERS: Yeah.

12 MR. STREET: -- I'll be like, let me  
13 see, and then I'll get back with you if it's  
14 not.

15 MS. SANDERS: Okay. I've got -- I  
16 have a little bit of a logistical issue,  
17 because Armando Lopez is at a funeral this week  
18 in Texas, but I've made arrangements for him to  
19 review everything.

20 He's going to -- I don't think it's going  
21 to be an issue, but that's the only -- getting  
22 him signed might be a little bit of an issue,  
23 but I've already spoken to him. He knows  
24 what's coming. You know, I told him I would  
25 get back with him, but he's in flight today.



1 He's in a funeral tomorrow. Thursday morning,  
2 he's going to take a look at these.

3 We should be fine. The only issue is if  
4 he can't sign them, but I'll get you the  
5 responses. They're due by Thursday.

6 MR. STREET: I don't -- I'm not going  
7 to fight for a day or two late, but I am  
8 probably going to put that into my motion to  
9 say, look, we're allowing them a couple extra  
10 days because Armando's at a funeral.

11 MS. SANDERS: Yeah.

12 MR. STREET: That supports my  
13 position to move discovery a little bit out.

14 MS. SANDERS: Yeah. Well, you're  
15 going to get them. It's just a matter -- I'll  
16 probably have them to you tomorrow. I just  
17 don't know --

18 MR. STREET: That'd be fine.

19 And really, if we can pass the deposition  
20 tomorrow so I can go get my head fixed --

21 MS. SANDERS: Uh-huh. Yeah.

22 MR. STREET: -- it would be great,  
23 so...

24 MS. SANDERS: I'm hoping they're  
25 going to respond and tell me she's -- hopefully

1 we can get all that --

2 MR. STREET: And that will be no  
3 problem at all because we'll get them before  
4 the first deposition, which will be Friday.  
5 And then if they're -- I think we'd still be  
6 fine.

7 MS. SANDERS: I think Lauren Piper  
8 just responded, let's see what she said.

9 Okay. JB Wagner is out on the 11th. Let  
10 me -- but let me just -- let me -- let me find  
11 out what that means. If that just means he's  
12 got a project due that day, we'll work that  
13 out.

14 MR. STREET: Okay.

15 MS. SANDERS: All right. Let's see,  
16 I think that was all of the individual ones.

17 Speaking of interrogatories, I don't know  
18 that I ever got your responses verified. Can  
19 you just double-check that?

20 MR. STREET: Yeah.

21 MS. SANDERS: I have moved law firms,  
22 so it's possible it just didn't get moved, you  
23 know.

24 MR. STREET: Okay.

25 MS. SANDERS: But I have your

1 responses, I just don't think I have them  
2 verified.

3 MR. STREET: Okay.

4 MS. SANDERS: If you can check on  
5 that, that would be great.

6 Okay. So let's see, that takes care of  
7 the sanctions, takes care of the -- I think  
8 that's everything, unless you have something.

9 MR. STREET: I don't. And it's  
10 the -- no, I don't.

11 MS. SANDERS: Okay. All right, so  
12 I'm going to find out about JB Wagner. I'm  
13 going to send you that. I'll talk to my client  
14 about extension.

15 We're not going to agree to the more than  
16 ten. Do you think you're going to go over ten?  
17 Because if so, we should talk about that.

18 MR. STREET: I mean, let's see how  
19 the first few go and then we can see.

20 MS. SANDERS: Okay. That's fair  
21 enough.

22 MR. STREET: Is it ten? I mean, I  
23 know the --

24 MS. SANDERS: Well, you've got nine  
25 left. It's ten without leave of court.

1 MR. STREET: Okay, ten for each  
2 Defendant? I don't remember off the top of my  
3 head.

4 MS. SANDERS: I thought it was ten  
5 total, but --

6 MR. STREET: Might be.

7 MS. SANDERS: -- I don't know. I'll  
8 just have to look at the rule, because I don't  
9 remember that.

10 MR. STREET: I do, too. I don't know  
11 off the top of my head, either.

12 MS. SANDERS: I rarely have multiple  
13 defendants.

14 MR. STREET: See, these lawyers, they  
15 don't remember everything you think we might  
16 remember constantly.

17 MS. SANDERS: No.

18 MR. STREET: There's a lot of stuff  
19 to try to stick up in there.

20 MS. SANDERS: And I don't -- I rarely  
21 have multiple defendants, so I never -- I don't  
22 think I've ever really looked at that, you  
23 know.

24 MR. STREET: Yeah. Me, neither,  
25 so...



1 MS. SANDERS: Okay. All right.  
 2 Well, we're good, I guess.  
 3 MR. STREET: All right, I'm glad we  
 4 did this.  
 5 MS. SANDERS: Yep.  
 6 (Proceeding concluded at 1:19 p.m. CST)  
 7  
 8  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 REPORTER'S CERTIFICATE  
 2  
 3 STATE OF TENNESSEE  
 4 COUNTY OF SUMNER  
 5 I, MICHELLE CHECUGA, Licensed Court Reporter,  
 6 with offices in Nashville, Tennessee, hereby certify  
 7 that I reported the foregoing Discovery Dispute  
 8 Conference by machine shorthand to the best of my  
 9 skills and abilities, and thereafter the same was  
 10 reduced to typewritten form by me.  
 11 I further certify that I am not related to  
 12 any of the parties named herein, nor their counsel,  
 13 and have no interest, financial or otherwise, in the  
 14 outcome of the proceedings.  
 15 I further certify that in order for this  
 16 document to be considered a true and correct copy, it  
 17 must bear my original signature and that any  
 18 unauthorized reproduction in whole or in part and/or  
 19 transfer of this document is not authorized, will not  
 20 be considered authentic, and will be in violation of  
 21 Tennessee Code Annotated 39-14-104, Theft of  
 22 Services.  
 23  
 24  
 25  
 26  
 27  
 28  
 29  
 30  
 31  
 32  
 33  
 34  
 35  
 36  
 37  
 38  
 39  
 40  
 41  
 42  
 43  
 44  
 45  
 46  
 47  
 48  
 49  
 50  
 51  
 52  
 53  
 54  
 55  
 56  
 57  
 58  
 59  
 60  
 61  
 62  
 63  
 64  
 65  
 66  
 67  
 68  
 69  
 70  
 71  
 72  
 73  
 74  
 75  
 76  
 77  
 78  
 79  
 80  
 81  
 82  
 83  
 84  
 85  
 86  
 87  
 88  
 89  
 90  
 91  
 92  
 93  
 94  
 95  
 96  
 97  
 98  
 99  
 100  
 101  
 102  
 103  
 104  
 105  
 106  
 107  
 108  
 109  
 110  
 111  
 112  
 113  
 114  
 115  
 116  
 117  
 118  
 119  
 120  
 121  
 122  
 123  
 124  
 125  
 126  
 127  
 128  
 129  
 130  
 131  
 132  
 133  
 134  
 135  
 136  
 137  
 138  
 139  
 140  
 141  
 142  
 143  
 144  
 145  
 146  
 147  
 148  
 149  
 150  
 151  
 152  
 153  
 154  
 155  
 156  
 157  
 158  
 159  
 160  
 161  
 162  
 163  
 164  
 165  
 166  
 167  
 168  
 169  
 170  
 171  
 172  
 173  
 174  
 175  
 176  
 177  
 178  
 179  
 180  
 181  
 182  
 183  
 184  
 185  
 186  
 187  
 188  
 189  
 190  
 191  
 192  
 193  
 194  
 195  
 196  
 197  
 198  
 199  
 200  
 201  
 202  
 203  
 204  
 205  
 206  
 207  
 208  
 209  
 210  
 211  
 212  
 213  
 214  
 215  
 216  
 217  
 218  
 219  
 220  
 221  
 222  
 223  
 224  
 225  
 226  
 227  
 228  
 229  
 230  
 231  
 232  
 233  
 234  
 235  
 236  
 237  
 238  
 239  
 240  
 241  
 242  
 243  
 244  
 245  
 246  
 247  
 248  
 249  
 250  
 251  
 252  
 253  
 254  
 255  
 256  
 257  
 258  
 259  
 260  
 261  
 262  
 263  
 264  
 265  
 266  
 267  
 268  
 269  
 270  
 271  
 272  
 273  
 274  
 275  
 276  
 277  
 278  
 279  
 280  
 281  
 282  
 283  
 284  
 285  
 286  
 287  
 288  
 289  
 290  
 291  
 292  
 293  
 294  
 295  
 296  
 297  
 298  
 299  
 300  
 301  
 302  
 303  
 304  
 305  
 306  
 307  
 308  
 309  
 310  
 311  
 312  
 313  
 314  
 315  
 316  
 317  
 318  
 319  
 320  
 321  
 322  
 323  
 324  
 325  
 326  
 327  
 328  
 329  
 330  
 331  
 332  
 333  
 334  
 335  
 336  
 337  
 338  
 339  
 340  
 341  
 342  
 343  
 344  
 345  
 346  
 347  
 348  
 349  
 350  
 351  
 352  
 353  
 354  
 355  
 356  
 357  
 358  
 359  
 360  
 361  
 362  
 363  
 364  
 365  
 366  
 367  
 368  
 369  
 370  
 371  
 372  
 373  
 374  
 375  
 376  
 377  
 378  
 379  
 380  
 381  
 382  
 383  
 384  
 385  
 386  
 387  
 388  
 389  
 390  
 391  
 392  
 393  
 394  
 395  
 396  
 397  
 398  
 399  
 400  
 401  
 402  
 403  
 404  
 405  
 406  
 407  
 408  
 409  
 410  
 411  
 412  
 413  
 414  
 415  
 416  
 417  
 418  
 419  
 420  
 421  
 422  
 423  
 424  
 425  
 426  
 427  
 428  
 429  
 430  
 431  
 432  
 433  
 434  
 435  
 436  
 437  
 438  
 439  
 440  
 441  
 442  
 443  
 444  
 445  
 446  
 447  
 448  
 449  
 450  
 451  
 452  
 453  
 454  
 455  
 456  
 457  
 458  
 459  
 460  
 461  
 462  
 463  
 464  
 465  
 466  
 467  
 468  
 469  
 470  
 471  
 472  
 473  
 474  
 475  
 476  
 477  
 478  
 479  
 480  
 481  
 482  
 483  
 484  
 485  
 486  
 487  
 488  
 489  
 490  
 491  
 492  
 493  
 494  
 495  
 496  
 497  
 498  
 499  
 500  
 501  
 502  
 503  
 504  
 505  
 506  
 507  
 508  
 509  
 510  
 511  
 512  
 513  
 514  
 515  
 516  
 517  
 518  
 519  
 520  
 521  
 522  
 523  
 524  
 525  
 526  
 527  
 528  
 529  
 530  
 531  
 532  
 533  
 534  
 535  
 536  
 537  
 538  
 539  
 540  
 541  
 542  
 543  
 544  
 545  
 546  
 547  
 548  
 549  
 550  
 551  
 552  
 553  
 554  
 555  
 556  
 557  
 558  
 559  
 560  
 561  
 562  
 563  
 564  
 565  
 566  
 567  
 568  
 569  
 570  
 571  
 572  
 573  
 574  
 575  
 576  
 577  
 578  
 579  
 580  
 581  
 582  
 583  
 584  
 585  
 586  
 587  
 588  
 589  
 590  
 591  
 592  
 593  
 594  
 595  
 596  
 597  
 598  
 599  
 600  
 601  
 602  
 603  
 604  
 605  
 606  
 607  
 608  
 609  
 610  
 611  
 612  
 613  
 614  
 615  
 616  
 617  
 618  
 619  
 620  
 621  
 622  
 623  
 624  
 625  
 626  
 627  
 628  
 629  
 630  
 631  
 632  
 633  
 634  
 635  
 636  
 637  
 638  
 639  
 640  
 641  
 642  
 643  
 644  
 645  
 646  
 647  
 648  
 649  
 650  
 651  
 652  
 653  
 654  
 655  
 656  
 657  
 658  
 659  
 660  
 661  
 662  
 663  
 664  
 665  
 666  
 667  
 668  
 669  
 670  
 671  
 672  
 673  
 674  
 675  
 676  
 677  
 678  
 679  
 680  
 681  
 682  
 683  
 684  
 685  
 686  
 687  
 688  
 689  
 690  
 691  
 692  
 693  
 694  
 695  
 696  
 697  
 698  
 699  
 700  
 701  
 702  
 703  
 704  
 705  
 706  
 707  
 708  
 709  
 710  
 711  
 712  
 713  
 714  
 715  
 716  
 717  
 718  
 719  
 720  
 721  
 722  
 723  
 724  
 725  
 726  
 727  
 728  
 729  
 730  
 731  
 732  
 733  
 734  
 735  
 736  
 737  
 738  
 739  
 740  
 741  
 742  
 743  
 744  
 745  
 746  
 747  
 748  
 749  
 750  
 751  
 752  
 753  
 754  
 755  
 756  
 757  
 758  
 759  
 760  
 761  
 762  
 763  
 764  
 765  
 766  
 767  
 768  
 769  
 770  
 771  
 772  
 773  
 774  
 775  
 776  
 777  
 778  
 779  
 780  
 781  
 782  
 783  
 784  
 785  
 786  
 787  
 788  
 789  
 790  
 791  
 792  
 793  
 794  
 795  
 796  
 797  
 798  
 799  
 800  
 801  
 802  
 803  
 804  
 805  
 806  
 807  
 808  
 809  
 810  
 811  
 812  
 813  
 814  
 815  
 816  
 817  
 818  
 819  
 820  
 821  
 822  
 823  
 824  
 825  
 826  
 827  
 828  
 829  
 830  
 831  
 832  
 833  
 834  
 835  
 836  
 837  
 838  
 839  
 840  
 841  
 842  
 843  
 844  
 845  
 846  
 847  
 848  
 849  
 850  
 851  
 852  
 853  
 854  
 855  
 856  
 857  
 858  
 859  
 860  
 861  
 862  
 863  
 864  
 865  
 866  
 867  
 868  
 869  
 870  
 871  
 872  
 873  
 874  
 875  
 876  
 877  
 878  
 879  
 880  
 881  
 882  
 883  
 884  
 885  
 886  
 887  
 888  
 889  
 890  
 891  
 892  
 893  
 894  
 895  
 896  
 897  
 898  
 899  
 900  
 901  
 902  
 903  
 904  
 905  
 906  
 907  
 908  
 909  
 910  
 911  
 912  
 913  
 914  
 915  
 916  
 917  
 918  
 919  
 920  
 921  
 922  
 923  
 924  
 925  
 926  
 927  
 928  
 929  
 930  
 931  
 932  
 933  
 934  
 935  
 936  
 937  
 938  
 939  
 940  
 941  
 942  
 943  
 944  
 945  
 946  
 947  
 948  
 949  
 950  
 951  
 952  
 953  
 954  
 955  
 956  
 957  
 958  
 959  
 960  
 961  
 962  
 963  
 964  
 965  
 966  
 967  
 968  
 969  
 970  
 971  
 972  
 973  
 974  
 975  
 976  
 977  
 978  
 979  
 980  
 981  
 982  
 983  
 984  
 985  
 986  
 987  
 988  
 989  
 990  
 991  
 992  
 993  
 994  
 995  
 996  
 997  
 998  
 999  
 1000  
 1001  
 1002  
 1003  
 1004  
 1005  
 1006  
 1007  
 1008  
 1009  
 1010  
 1011  
 1012  
 1013  
 1014  
 1015  
 1016  
 1017  
 1018  
 1019  
 1020  
 1021  
 1022  
 1023  
 1024  
 1025  
 1026  
 1027  
 1028  
 1029  
 1030  
 1031  
 1032  
 1033  
 1034  
 1035  
 1036  
 1037  
 1038  
 1039  
 1040  
 1041  
 1042  
 1043  
 1044  
 1045  
 1046  
 1047  
 1048  
 1049  
 1050  
 1051  
 1052  
 1053  
 1054  
 1055  
 1056  
 1057  
 1058  
 1059  
 1060  
 1061  
 1062  
 1063  
 1064  
 1065  
 1066  
 1067  
 1068  
 1069  
 1070  
 1071  
 1072  
 1073  
 1074  
 1075  
 1076  
 1077  
 1078  
 1079  
 1080  
 1081  
 1082  
 1083  
 1084  
 1085  
 1086  
 1087  
 1088  
 1089  
 1090  
 1091  
 1092  
 1093  
 1094  
 1095  
 1096  
 1097  
 1098  
 1099  
 1100  
 1101  
 1102  
 1103  
 1104  
 1105  
 1106  
 1107  
 1108  
 1109  
 1110  
 1111  
 1112  
 1113  
 1114  
 1115  
 1116  
 1117  
 1118  
 1119  
 1120  
 1121  
 1122  
 1123  
 1124  
 1125  
 1126  
 1127  
 1128  
 1129  
 1130  
 1131  
 1132  
 1133  
 1134  
 1135  
 1136  
 1137  
 1138  
 1139  
 1140  
 1141  
 1142  
 1143  
 1144  
 1145  
 1146  
 1147  
 1148  
 1149  
 1150  
 1151  
 1152  
 1153  
 1154  
 1155  
 1156  
 1157  
 1158  
 1159  
 1160  
 1161  
 1162  
 1163  
 1164  
 1165  
 1166  
 1167  
 1168  
 1169  
 1170  
 1171  
 1172  
 1173  
 1174  
 1175  
 1176  
 1177  
 1178  
 1179  
 1180  
 1181  
 1182  
 1183  
 1184  
 1185  
 1186  
 1187  
 1188  
 1189  
 1190  
 1191  
 1192  
 1193  
 1194  
 1195  
 1196  
 1197  
 1198  
 1199  
 1200  
 1201  
 1202  
 1203  
 1204  
 1205  
 1206  
 1207  
 1208  
 1209  
 1210  
 1211  
 1212  
 1213  
 1214  
 1215  
 1216  
 1217  
 1218  
 1219  
 1220  
 1221  
 1222  
 1223  
 1224  
 1225  
 1226  
 1227  
 1228  
 1229  
 1230  
 1231  
 1232  
 1233  
 1234  
 1235  
 1236  
 1237  
 1238  
 1239  
 1240  
 1241  
 1242  
 1243  
 1244  
 1245  
 1246  
 1247  
 1248  
 1249  
 1250  
 1251  
 1252  
 1253  
 1254  
 1255  
 1256  
 1257  
 1258  
 1259  
 1260  
 1261  
 1262  
 1263  
 1264  
 1265  
 1266  
 1267  
 1268  
 1269  
 1270  
 1271  
 1272  
 1273  
 1274  
 1275  
 1276  
 1277  
 1278  
 1279  
 1280  
 1281  
 1282  
 1283  
 1284  
 1285  
 1286  
 1287  
 1288  
 1289  
 1290  
 1291  
 1292  
 1293  
 1294  
 1295  
 1296  
 1297  
 1298  
 1299  
 1300  
 1301  
 1302  
 1303  
 1304  
 1305  
 1306  
 1307  
 1308  
 1309  
 1310  
 1311  
 1312  
 1313  
 1314  
 1315  
 1316  
 1317  
 1318  
 1319  
 1320  
 1321  
 1322  
 1323  
 1324  
 1325  
 1326  
 1327  
 1328  
 1329  
 1330  
 1331  
 1332  
 1333  
 1334  
 1335  
 1336  
 1337  
 1338  
 1339  
 1340  
 1341  
 1342  
 1343  
 1344  
 1345  
 1346  
 1347  
 1348  
 1349  
 1350  
 1351  
 1352  
 1353  
 1354  
 1355  
 1356  
 1357  
 1358  
 1359  
 1360  
 1361  
 1362  
 1363  
 1364  
 1365  
 1366  
 1367  
 1368  
 1369  
 1370  
 1371  
 1372  
 1373  
 1374  
 1375  
 1376  
 1377  
 1378  
 1379  
 1380  
 1381  
 1382  
 1383  
 1384  
 1385  
 1386  
 1387  
 1388  
 1389  
 1390  
 1391  
 1392  
 1393  
 1394  
 1395  
 1396  
 1397  
 1398  
 1399  
 1400  
 1401  
 1402  
 1403  
 1404  
 1405  
 1406  
 1407  
 1408  
 1409  
 1410  
 1411  
 1412  
 1413  
 1414  
 1415  
 1416  
 1417  
 1418  
 1419  
 1420  
 1421  
 1422  
 1423  
 1424  
 1425  
 1426  
 1427  
 1428  
 1429  
 1430  
 1431  
 1432  
 1433  
 1434  
 1435  
 1436  
 1437  
 1438  
 143

---

**\$**

---

**\$10,000** 39:5

---

**1**

---

**1** 12:7,8 23:8  
**10** 11:7 12:6  
**100** 49:1  
**103** 54:4  
**10th** 4:14,19 5:7,9,15,20 6:8,21  
**11** 48:20,21 54:14,19  
**11th** 3:22 4:3 7:8 9:1 74:9  
**12** 54:20  
**120** 16:19,20  
**121** 54:20  
**12th** 14:2  
**13** 55:4  
**137** 55:5  
**140** 55:18  
**141** 55:21  
**146** 56:12  
**15** 56:17  
**150** 16:19,23  
**15th** 16:2  
**16** 56:20  
**17** 56:24  
**182** 56:23  
**186** 58:2  
**19** 58:10  
**19's** 58:10  
**1:19** 77:6

---

**2**

---

**2** 12:7 23:17,23 24:5,8 25:21,22 66:19 67:6,7  
**20** 31:7 33:16 58:11

**20's** 58:11  
**2020** 54:21  
**21** 28:1 58:12  
**21,000** 45:20  
**22** 28:3,10 58:19  
**226** 58:12,13  
**23** 58:20  
**23rd** 22:19,23  
**24** 59:14  
**24th** 33:12,17  
**25** 62:8,19  
**250** 59:14,15 60:19  
**254** 61:5,23  
**259** 62:20  
**26** 32:13 63:8  
**262** 62:20  
**264** 62:20  
**27** 63:22  
**28** 63:24  
**28's** 63:25  
**282** 63:11  
**29** 64:2,3

---

**3**

---

**3** 12:8  
**30** 64:4,5  
**30(b)(6)** 17:13,16,17 18:1,17  
**31** 64:4 66:3  
**324** 64:5  
**330** 27:13  
**350** 19:12

---

**4**

---

**4** 32:13 35:11  
**40** 35:12  
**40,000** 71:22  
**47** 38:8

**48,000** 45:20  
**4th** 13:15 28:3

---

**5**

---

**5** 24:11 67:8,10 68:8  
**5's** 67:8  
**51** 39:3  
**53** 40:6  
**54** 40:6,7  
**57** 41:5

---

**6**

---

**6** 39:1  
**6,000** 70:20,21  
**60-day** 32:15  
**67** 43:21  
**68** 43:25

---

**7**

---

**7** 24:23 25:21 69:21 70:13  
**74** 46:12

---

**8**

---

**8** 46:11  
**81** 49:21 50:19  
**82** 50:24 51:13  
**87** 50:24 51:14  
**8th** 4:14,18,21 5:8,9,15, 20,21 6:7,21 9:2

---

**9**

---

**9** 24:22 25:4 50:22  
**90** 39:21,22  
**90,000** 39:4,17  
**900** 55:11  
**900-person** 55:5,9  
**93** 52:14

**95** 53:17  
**9:00** 12:12  
**9th** 3:22,23,24 12:2

---

**A**

---

**acknowledge** 32:5  
**acting** 44:13  
**actions** 24:18 61:6,9,24  
**actual** 22:11 26:16  
**address** 23:10 29:13 66:7,9  
**addressing** 23:22  
**admit** 31:7  
**adverse** 61:5,9,23  
**affect** 16:12 53:18  
**afternoon** 11:8 12:5,22 15:3  
**agenda** 60:13  
**agendas** 60:11,16  
**agree** 6:3 18:25 19:20,21 20:15,18 31:1 41:22 65:1 75:15  
**agreeing** 20:13  
**ahead** 66:21  
**aided** 51:16  
**Air-conditioning** 57:17  
**allegation** 58:25 59:15  
**allegations** 26:14 28:18 49:12  
**allowing** 73:9  
**alteregos** 55:20  
**Amend** 28:12  
**amended** 27:18,21  
**American** 54:23  
**Amos** 3:21 9:6 10:16 29:7 32:7 33:22 44:10 49:22 50:6 63:13  
**Amos's** 26:9 42:21  
**amplified** 56:13  
**and/or** 71:11,14

**Anderson** 34:7,8 36:6,  
20 37:22

**Angeles** 11:3

**annual** 39:4

**answer's** 53:15

**anti-mask** 64:7

**anymore** 6:9 67:15

**apologizing** 59:21

**applicant** 33:3

**apply** 28:19

**approved** 39:7

**April** 8:25

**Armando** 3:23 4:2 9:6  
11:9,14 12:10,12 39:6  
40:3,12 41:7 42:18  
43:12,16,19 44:5 52:12  
53:21 56:5 63:5 72:17

**Armando's** 10:21 18:6  
73:10

**arrangements** 72:18

**article** 64:17,20

**articles** 64:17

**ascertain** 19:3,9

**asks** 23:5,9 24:10

**assistance** 49:21,23  
50:12

**assuming** 51:5 63:10,14

**attached** 64:17

**attended** 62:14

**attitude** 58:4

**attorney** 11:25

**attributed** 58:16

**audio** 60:3,20

**audios** 59:21 60:15

**August** 17:1

**authority** 67:14

**availability** 8:21

**aversion** 64:7

**aware** 19:10 65:23

**axle** 30:4

---

## B

---

**back** 8:24 10:24 11:2,12,  
19 18:10 39:1 46:7 61:2  
66:18 72:13,25

**base** 30:13

**based** 21:3 40:23 66:14

**basically** 21:4

**Bates** 45:6

**bay** 58:2

**behalf** 44:14

**behaved** 62:11

**beliefs** 56:12,13

**big** 57:9

**bigger** 50:9

**bit** 11:17 12:9 72:16,22  
73:13

**blah** 30:2

**board** 37:4 43:7 56:2  
67:12

**bonus** 39:5

**booked** 5:21

**Borrowed** 46:14

**bottom** 64:5

**Brad** 29:7 32:7 33:21  
42:21 47:23 63:13 67:16

**Brad's** 47:7

**Brandon** 16:5

**brood** 64:15

**brought** 53:11

**buckets** 3:7

**business** 3:12

**busy** 19:16

---

## C

---

**calendar** 18:24

**call** 9:21 10:5 17:20  
67:18

**called** 6:16 30:5

**calling** 36:14

**captured** 46:25

**care** 67:7 75:6,7

**careful** 29:24

**case** 13:6 16:7 29:15  
31:6

**cases** 19:13

**category** 52:8

**certificate** 22:20

**cetera** 37:14

**chance** 4:5

**change** 4:10 5:22

**charge** 41:7,9

**chart** 49:7

**check** 4:13 8:25 12:15  
13:5,11 75:4

**chose** 63:3

**Christian** 35:17

**circle** 25:2

**citizens** 54:23

**civil** 19:12

**claim** 41:23

**claims** 51:18 66:5,7,13

**clarification** 58:13

**clear** 42:6 58:24 71:7

**client** 19:24 31:17,18  
34:12 39:11 51:25 54:2  
75:13

**clues** 42:25

**coffee** 8:6

**commentary** 35:15

**community** 35:15

**company** 57:18,19,20,  
25 65:19,22

**compel** 23:20 46:20

**compelling** 23:21

**complaint** 26:15 27:1,  
18,21 28:12 41:17 58:24  
63:19 64:18

**complete** 33:13

**concern** 54:23

**concerns** 70:4,5

**concluded** 77:6

**conducted** 53:24

**conference** 62:9,14,15

**confirm** 12:1

**conflating** 30:18

**connect** 7:21 8:10,11,12  
37:4

**connected** 8:12

**constantly** 41:24 76:16

**constraints** 46:6

**construction** 57:9

**contention** 24:9

**context** 32:22

**continuation** 17:17

**controlled** 55:19

**conversation** 10:11  
67:24,25

**conversations** 63:25  
67:16

**cooperate** 37:16

**cooperative** 38:1

**coordinating** 6:11

**copy** 22:2 28:5,6 64:19

**Coronavirus/covid-19**  
54:22

**correct** 21:13

**correctly** 58:15

**count** 27:13

**counts** 26:16 27:2,12

**couple** 17:10 47:1 73:9

**court** 5:25 9:15 14:5  
75:25

**Court's** 28:2

**cover** 13:4

**covered** 11:20

**COVID** 55:7 56:13

**coworkers** 43:22 51:3,7

**crammed** 58:3  
**created** 28:9  
**criminal** 19:12  
**criticize** 65:15  
**criticized** 64:6,15 65:9, 23  
**CST** 77:6  
**CT** 4:6  
**cult-like** 35:16  
**cut** 46:13

---

## D

---

**Daniel** 10:21 63:11  
**data** 33:3  
**date** 7:9 22:17 36:16  
**dates** 4:20 15:14  
**Dave** 43:7  
**David** 5:9 6:8 47:2 49:6  
**day** 4:2,23 5:3,12,14 6:7 9:7 12:13,19 13:1 46:18 69:16 73:7 74:12  
**day-to-day** 57:25  
**days** 4:14 5:16,18 16:19 21:11,23 73:10  
**deadline** 15:15 21:12  
**decision** 24:15 67:11 68:3,20,23 69:4  
**Defendant** 38:9 41:22 64:25 70:3,24,25 71:9, 11,12 76:2  
**defendants** 64:5 76:13, 21  
**defer** 41:4 61:14  
**demonstrated** 55:7  
**department** 48:10  
**depo** 4:5  
**depose** 32:1 34:11 36:14,20 37:24 43:20 56:8 57:1  
**deposing** 34:22  
**deposition** 3:21 11:19

13:6 19:21 52:20 73:19 74:4  
**depositions** 13:21,24 14:17,22 15:18,23  
**describe** 70:2  
**detail** 24:3  
**devotionals** 60:14  
**Dicicco** 5:9 6:8,22 9:5,9 32:12 34:1 47:2,9,15,20 49:6 50:1,2  
**direct** 60:1  
**directing** 56:24  
**discharge** 27:13 66:6  
**disclosed** 33:25  
**disclosures** 33:6,16  
**discovery** 14:19 15:15 17:21 18:25 19:1 73:13  
**dismiss** 31:3  
**dispute** 39:13 51:21 53:6 55:23 61:7  
**disputed** 39:11  
**disputes** 51:18  
**distance** 63:2  
**distancing** 64:8  
**distinct** 49:5  
**distinguish** 34:13  
**docket** 19:12  
**document** 28:1 33:8 68:6  
**documentary** 48:5,12 50:3  
**documents** 3:13 15:19 31:12 40:18 43:15 44:16 45:3,4,18,19 46:4,15 47:9 48:22 49:1 67:16 68:1,16 69:9,10 70:21,22 72:5  
**double** 11:21  
**double-check** 4:22 24:21 74:19  
**due** 16:25 73:5 74:12  
**duplicates** 48:24

---

## E

---

**e-mail** 4:15 12:21 19:25 43:25 49:6  
**e-mailed** 4:17  
**e-mails** 40:19,20,21 44:1 69:25  
**early** 33:1 34:10 37:24 51:16 54:21  
**easier** 7:12 18:5  
**easiest** 49:9  
**easy** 3:10 23:12 37:4 58:10 67:9 69:5,18,19  
**EC** 7:17  
**edit** 58:2  
**ELP** 54:11  
**Emerson** 59:16 63:9  
**emotional** 67:19  
**employee** 55:15 65:5 70:24 71:12  
**employees** 7:13 52:14 53:19 61:6,19  
**employment** 24:17 26:3,12 61:5,9,23  
**encouraged** 43:21 44:2  
**encourages** 41:23  
**end** 14:10 19:1  
**endorsed** 54:5,7  
**enormous** 19:12  
**evaluations** 33:14  
**ex-employee** 65:5  
**exception** 29:12  
**executive** 56:24  
**expects** 21:6  
**expressing** 41:23  
**extend** 20:18  
**extension** 14:4,6,11 18:21,25 19:18,20 75:14  
**extent** 55:20 61:8  
**extra** 73:9

---

## F

---

**Facebook** 43:22 65:8,9  
**fact** 9:18 27:14 39:11  
**facts** 24:2 25:23 29:1,15 66:8,10,14,15  
**factual** 28:18  
**fair** 61:4 63:20 75:20  
**familiar** 26:9  
**fast** 20:21  
**faster** 8:9 9:22 54:15  
**fear** 55:6  
**feasible** 56:25  
**feel** 21:5 41:21 53:10,11 57:24 59:25 67:3  
**feels** 42:10  
**fewer** 70:22  
**fight** 73:7  
**figure** 9:23 10:16 18:21 30:25 42:23 43:14  
**figures** 43:19  
**filed** 21:5,6,7,20 23:18 27:24 28:3 31:2,3,5  
**filing** 28:2  
**find** 9:21 10:13 36:16 37:25 41:2 49:9,14 58:5 74:10 75:12  
**finding** 8:21  
**fine** 10:20 11:10 22:12,13 34:25 38:14 39:15 40:4 45:7 46:1 63:23 66:13 68:17 71:20 73:3,18 74:6  
**finish** 6:1 12:10  
**finite** 70:15  
**firing** 67:19  
**firms** 74:21  
**fit** 14:1 25:14 52:7  
**fixed** 73:20  
**flew** 10:24 11:2  
**flight** 72:25



**floating** 20:6  
**focussed** 50:3  
**folks** 56:7  
**follow** 12:20 43:10  
**footnoted** 64:22  
**forget** 7:19  
**form** 25:9  
**format** 43:9  
**found** 35:14  
**free** 13:7  
**Friday** 7:2 9:5,13,15 74:4  
**friends** 43:22  
**funeral** 72:17 73:1,10  
**Future** 46:14

---

## G

---

**gatherings** 62:21,23  
**gave** 31:12 33:13  
**general** 43:9  
**generally** 45:2  
**get all** 74:1  
**give** 5:25 12:9 21:16  
32:21 38:21 42:25 67:18  
72:3,5  
**giving** 26:2 42:17 43:12  
**glad** 69:22 77:3  
**Gonzales** 63:9  
**good** 3:3 8:7 11:17,21  
26:21 41:8 48:25 52:11  
54:18 77:2  
**governor** 56:23 57:2,23  
**great** 13:11 73:22 75:5  
**greet** 43:4  
**group** 70:15  
**guess** 18:20 72:2 77:2  
**guest** 7:15  
**guy** 42:13  
**guys** 14:13 19:20

---

## H

---

**half** 50:23  
**hall** 57:5,7  
**happen** 67:21  
**happened** 60:4  
**head** 40:3,12 73:20 76:3,  
11  
**heard** 56:15  
**hearing** 16:11  
**held** 10:11  
**helps** 6:8 28:2  
**hit** 15:15  
**home** 56:25 61:7  
**honestly** 26:17  
**hoping** 73:24  
**hour** 12:24 13:1  
**hours** 12:17  
**house** 54:9  
**HR** 39:6 40:3,12 41:4  
43:5 61:9,14,24  
**HRC** 17:16

---

## I

---

**idea** 51:11  
**identified** 32:1 34:10  
51:1,22  
**identify** 23:23 24:14,25  
43:24 52:14 54:24 70:2  
71:20  
**impact** 26:11  
**implement** 63:3  
**implementing** 63:1  
**inbox** 70:17  
**incident** 60:2  
**inclined** 18:24  
**include** 25:13 29:25  
66:21  
**included** 18:7,13 26:10

**including** 52:16  
**indicating** 35:16  
**individual** 23:4 74:16  
**individually** 17:25 23:5  
**individuals** 24:11 25:12,  
13  
**indoctrination** 41:6  
**inform** 31:18  
**information** 23:11 34:20  
54:6 62:4 63:13  
**informed** 58:14  
**initial** 33:6,15  
**intends** 19:17  
**intent** 67:25  
**internal** 32:18  
**interrogatories** 22:1,8  
23:12 74:17  
**interrogatory** 22:11  
25:9 66:18 68:8  
**interview** 30:8,14 31:12  
33:4 34:16 35:11,13 39:2  
**interviewed** 30:21 31:19  
32:16 33:17 34:2,11,14  
35:4 44:14,15 67:1

**interviews** 31:8 32:15  
**investigate** 30:8  
**investigation** 30:5  
40:23  
**investigations** 25:5  
**involved** 24:14  
**issuance** 37:14  
**issue** 6:8 12:16 20:24  
26:13 38:2 68:4 72:16,  
21,22 73:3  
**issued** 3:10 56:23  
**issues** 52:15,16

---

## J

---

**JB** 4:24 5:4,10 7:6,8 9:10,  
22 26:3,4 34:2 50:1,2,8  
52:4,6 59:9 74:9 75:12

**JB's** 8:21  
**jerk** 20:9  
**job** 23:10 70:5 71:6  
**Jobvite** 32:17 33:2,4,8,  
10,14,18 34:5,13 35:3  
66:25 67:2  
**John** 7:16  
**Johnson** 4:10 34:1  
50:10 52:25 58:16,22  
59:3 64:1  
**join** 14:15  
**Jon** 3:2  
**Judge** 17:20 30:5,17  
36:11 72:10  
**Judge's** 19:2  
**judgment** 16:25  
**July** 17:2  
**June** 16:6,13  
**jury** 16:2 19:14

---

## K

---

**keeping** 17:10  
**Kim** 29:13  
**Kimberly** 29:3 31:1  
37:22  
**kind** 15:12 26:5 41:14  
47:3  
**knew** 26:2 33:21 65:14  
69:8  
**knowledge** 24:1,4 25:23  
26:18 27:8 28:25 30:12,  
15 41:13 42:4 44:9 51:11  
55:9,24 59:17 62:10,22  
64:10

---

## L

---

**LA** 12:6,7  
**ladies** 46:10  
**Lampo** 26:18 27:3,8  
35:16 38:10 39:3 43:21  
44:1,14 46:10 49:13  
53:19 55:19,22 61:5  
70:17

**Lampo's** 22:7,14 46:14  
**lands** 15:9  
**large** 46:23  
**Larry** 34:6,8 36:5,6,20,21 37:21  
**late** 12:19 73:7  
**Laura** 4:10,14 5:4,7,10 7:12 9:2,5 34:1 49:16 50:10 52:25 58:16,22 59:3,5 64:1  
**Lauren** 9:19,21,25 10:1, 3,4,17 13:3 16:2 74:7  
**Lauren's** 16:11  
**law** 7:18 74:21  
**lawsuit** 36:17  
**lawyers** 76:14  
**lead** 26:5  
**leads** 43:5  
**leave** 75:25  
**Lee** 56:23 57:2,14,16,18, 19,25  
**Lefevre** 7:3 34:1 37:1 56:5 67:11 68:20 69:5  
**Lefevre's** 68:3  
**left** 75:25  
**legal** 66:13  
**Leo** 63:9  
**Leslie** 72:1  
**lets** 34:20  
**life** 70:6 71:6  
**likes** 16:19  
**limited** 14:17 56:7 68:16  
**link** 10:17  
**linked** 49:12  
**list** 3:6,19 4:13 17:6 29:23 31:15,16 38:12 40:11 43:11 44:17 48:10 51:7 56:7 58:8 62:3 63:9, 10,14,18 64:9 66:20 68:15  
**listed** 29:4 36:6 47:22,23 48:2 63:11,18 66:21

**listen** 59:22 60:7  
**listened** 60:24  
**literally** 46:17  
**litigation** 24:3 25:24  
**lives** 52:16  
**LLC** 27:8  
**local** 35:14 54:5,7,8  
**locally** 8:11  
**located** 27:4  
**log** 32:19 45:9  
**logistical** 72:16  
**long** 6:7 34:19 69:13  
**longer** 29:5 36:7 37:1  
**looked** 11:19 22:1 49:13 76:22  
**Lopez** 3:24 72:17  
**Lopez's** 44:5  
**Los** 11:3  
**lot** 11:20 25:12 26:14 28:19,23,24 29:1 54:15 76:18  
**Luke** 7:3 9:5 34:1 37:1 49:16 56:5 67:9,11 68:3, 20 69:5

## M

**made** 5:17 25:1 33:18 39:3,21,22 67:11 68:20 69:2,4 71:4 72:18  
**major** 46:14  
**make** 5:8 6:17,25 9:11 19:18 21:10 22:2 23:6,21 26:22 30:1 46:21 48:7, 20,21 55:17  
**makes** 32:13 49:9  
**making** 24:14  
**Mansueto** 3:12  
**March** 28:3,6,9  
**marked** 48:22  
**marriages** 52:17  
**masks** 63:2

**mass** 62:21  
**matter** 22:10 24:2 25:24 39:18,22 42:2 73:15  
**max** 12:17  
**means** 41:12 67:20,21 74:11  
**meant** 17:17,18  
**media** 44:4,12,23  
**meet** 43:4  
**meeting** 55:5,10 59:20 60:3 62:14  
**meetings** 53:20,25 58:21 59:22 60:10,20 62:9,10,11  
**Melissa** 3:21 10:16  
**member** 37:4  
**memorized** 61:2  
**Memphis** 16:4  
**mentioned** 17:13  
**message** 44:4,5,12,23  
**messages** 69:24 70:1  
**met** 12:1  
**middle** 16:12 19:13 49:7  
**mind** 9:20 14:10 44:24  
**missed** 46:22  
**missing** 33:11  
**Monday** 9:5  
**month** 16:16  
**morning** 11:9 73:1  
**motion** 14:15,17 19:3,9 20:6 21:25 23:19,20 31:3 36:10 45:1 46:20 73:8  
**motions** 15:12  
**move** 4:2 7:6,7 19:21 73:13  
**moved** 74:21,22  
**moving** 38:8,9 54:14  
**multiple** 33:7 76:12,21

## N

**naming** 17:24  
**narrow** 25:25 26:15  
**narrowed** 23:6  
**nature** 24:4  
**news** 54:22 65:7  
**nobody's** 29:20  
**noon** 11:7  
**normal** 12:18  
**note** 67:5  
**notes** 32:6,17 33:15,18  
**noticed** 9:14  
**number** 23:8,17,23 24:5, 11,22,23 25:4 31:7 35:12 42:22 45:7,20 56:24 62:17 66:18 68:8,16 69:21 70:13 71:20  
**numbered** 58:24  
**numerous** 56:14

## O

**observed** 52:6  
**October** 33:12,13,16,17  
**off-the-record** 10:10  
**offer** 39:3,8,23 40:2 41:12  
**offered** 40:2  
**offering** 41:7  
**office** 55:7 57:4,6  
**offices** 57:14  
**on-board** 40:14 43:3  
**on-boarded** 40:10,24 42:22,24,25 43:11 58:15  
**on-boarding** 40:7,9,13, 23 41:8 42:16,19,21  
**one's** 24:13 56:18  
**one-month** 19:14  
**one-on-one** 53:20,25 59:5

**one-on-ones** 58:22  
59:3,9

**operating** 37:4 43:6  
56:2 67:12

**operative** 27:21

**opinion** 42:1

**oppose** 14:15 21:19

**order** 15:20 20:2,20  
21:25 23:2,21 56:24

**ordering** 20:13

**oriented** 67:23

**original** 22:7 68:11

**originally** 4:15

**outbox** 70:19

---

## P

---

**p.m.** 77:6

**Pacific** 10:23

**pages** 28:15 47:1,2  
70:22 71:22

**paragraph** 27:12 50:17

**part** 16:8 45:1 68:4

**participate** 53:19

**party** 36:17

**party-like** 58:4

**pass** 73:19

**password** 7:18

**PDF** 28:6

**people** 17:10,24 23:5  
24:19 26:2 27:8 28:24,25  
32:15 33:21 34:4 35:2  
36:3,12,13 38:12 42:22  
43:6 47:5,7,15,21,23,24  
51:1 52:3,4,5 55:11 58:3,  
5 62:3,10,12,13 63:1,10,  
12 65:2,7,8,15,19,22  
68:21 69:8 71:11

**perfect** 13:19

**performance** 26:9  
50:25 51:2,4 70:5 71:6

**period** 60:7

**person** 10:20 23:10,23

34:20,21 68:19 69:4

**person's** 24:4

**personal** 4:4 52:15 70:5  
71:6

**persons** 24:14

**phone** 8:17 10:11 31:8,  
19

**picture** 50:9

**pinpoint** 8:23

**Piper** 74:7

**place** 38:11 48:25 49:9

**places** 46:16

**Plaintiff** 12:24 31:8  
35:13,22 39:4 41:19 42:2  
43:21 46:13 58:14 70:3,  
16,23 71:4,5,9,10,13

**Plaintiff's** 22:8 24:17  
41:17 42:8 44:2

**plan** 15:5 47:3

**plans** 19:11

**plenty** 12:13 16:22

**podcast** 46:14

**point** 33:21 39:22 45:2,3  
47:9 66:25 67:1 68:17  
69:10

**pointed** 48:17 69:22

**policies** 63:3

**policy** 63:1

**position** 61:20 64:7  
73:13

**power** 67:13

**praise** 41:24

**prefer** 14:14 37:16

**prerogative** 6:4

**pretty** 20:21 23:8 24:13  
26:8 46:3 49:24 50:2  
56:18 63:24 64:15 66:4  
67:9 69:18,19 70:14 71:7

**primarily** 30:17

**print** 64:19

**privilege** 46:5

**problem** 74:3

**proceeding** 77:6

**process** 32:16 33:4 39:2  
40:7,9,13 41:6 42:17,19

**produce** 45:14 46:18,19

**produced** 32:18,23  
44:1,3,11,22 45:9

**production** 32:19

**program** 54:11

**project** 47:6 74:12

**projects** 57:10

**pronounce** 3:11

**prove** 42:11

**provided** 23:11 33:1  
34:20 49:21,22 50:12  
64:23

**provider** 54:6,7,8

**publicly** 64:6,14 65:15,  
23

**pull** 4:16 22:3,4 32:18  
48:19

**pulled** 22:25 48:23

**purpose** 59:20

**put** 9:1,4 11:8 25:9 29:24  
36:10 73:8

**putting** 14:10

---

## Q

---

**qualify** 32:8

**question** 30:7,11 35:25  
66:2

**questions** 30:6,19

**quick** 9:21 10:6

---

## R

---

**radio** 38:10 56:14

**Ramsey** 6:9 7:11 9:12  
36:7 38:10 41:11,22,23,  
24 43:7,8 55:6,19,22,25  
59:17 67:19

**Ramsey's** 14:10 19:21  
56:12

**random** 65:2

**range** 69:14 72:4,5

**ranges** 45:25

**rarely** 76:12,20

**reached** 36:22 37:24  
54:9

**read** 23:2,24 40:19 61:2

**ready** 3:2 11:13

**real** 24:9

**realized** 33:6,10 38:19

**reason** 13:17 48:17

**reasonable** 45:25

**recall** 39:21 46:17

**record** 43:1 61:25

**recruiter** 29:4 32:6  
66:22

**recruiting** 31:13

**reference** 35:2

**referenced** 53:3

**related** 47:19

**relating** 24:2 25:23

**relationship** 67:23

**relevant** 24:2 25:23  
30:19

**relocation** 39:5

**remember** 21:9 22:17  
32:7 35:8 52:19,22 53:10  
76:2,9,15,16

**remembers** 29:6

**repeat** 66:4

**REPORTER** 7:23 8:13

**reporters** 65:2,20

**requested** 61:6

**required** 46:19 52:13,14  
53:19

**research** 35:13

**reserved** 12:23

**respond** 73:25

**responded** 19:9 74:8

**response** 19:2 22:11

23:19 25:10,14 45:14  
47:16 68:12

**responses** 22:7,14  
25:13 72:7 73:5 74:18  
75:1

**responsible** 52:6

**responsive** 48:22 68:15

**rest** 13:25 26:10 52:11

**retaliatory** 27:13 66:6

**review** 46:4 72:19

**reviewed** 46:4,6

**reviews** 35:14

**ridiculous** 72:10

**roles** 26:11

**roster** 38:22 55:16

**Rudolph** 29:3,13 31:1,7  
37:22

**rule** 9:16 19:4,10,11,17  
20:21 76:8

---

## S

---

**salary** 39:4

**sanctions** 21:24 23:18,  
20 75:7

**SANDERS** 3:2,5,9,16,18  
4:1,8,12,25 5:4,6,12,16  
6:2,6,11,15,23 7:3,5,20,  
25 8:7,14 9:4,9,14 10:1,  
3,8,12,15,19 11:1,4,15,  
18,24 12:4,14 13:8,10,  
14,17 14:4,7,12,16,20,24  
15:2,8,21,25 16:3,9,14,  
17,20,24 17:2,8,12,22  
18:1,3,6,9,12,16,20,23  
19:8,22 20:4,7,11,15,17,  
20,23 21:2,8,13,16,22  
22:6,15,18 23:1,14 24:1,  
24 25:2,7,19 26:8 27:7,  
11,16,20,23 28:1,7,11,  
16,21 29:2,10,17,19  
30:3,11,24 31:5,11,20,  
22,24 32:3,11,21 33:20,  
24 34:9,24 35:1,6,19,23  
36:1,4,18,24 37:3,8,12,  
15,19 38:4,15,17,20,25  
39:12,16,20 40:1,6,17  
41:3,20,25 42:3,12,15  
43:18 44:7,20 45:5,8,12,

15,18,21,24 46:2 47:5,  
12,14 48:1,7,9,15 49:4,  
19 50:6,16,19,21 51:10,  
14,19,23 52:1,10,21,24  
53:2,5,8,13,16,23 54:3,  
12,18 55:2,12,14 56:1,4,  
9,17 57:3,6,11,15,18,21,  
24 58:9,18 59:2,7,11,14,  
25 60:10,13,18,23 61:4,  
12,17,22 62:2,6,19 63:4,  
7,17,21 64:14 65:3,6,11,  
17,21 66:1,11,15,24  
68:7,10,18 69:1,7,12,15,  
18 70:8,12,14,19 71:1,8,  
13,18,21 72:2,7,11,15  
73:11,14,21,24 74:7,15,  
21,25 75:4,11,20,24  
76:4,7,12,17,20 77:1,5

**satellite** 57:14

**scads** 69:25

**scan** 4:6

**schedule** 7:13 17:5  
36:22

**scheduled** 11:6 12:7

**searches** 72:4

**section** 27:15

**sell** 54:9

**send** 10:17 12:21 17:14  
19:24 72:8 75:13

**sense** 19:18 30:1 32:13  
48:7 49:10 55:17

**September** 22:19,23

**service** 22:21

**set** 22:8 46:19 48:18,19  
49:1

**Shane** 59:15 63:9

**she'd** 4:14 20:25

**she'll** 10:8

**short** 20:12 69:14

**shorter** 11:23

**show** 31:17 32:6 56:14  
72:4

**showing** 8:2

**shows** 47:5,10

**sides** 15:18

**sign** 73:4

**signed** 22:20 72:22

**simple** 23:8 36:14,25

**sit** 10:21

**sitting** 9:23

**skip** 24:24

**small** 3:6 58:3

**social** 44:3,12,22 63:2  
64:8

**soda** 8:6

**sole** 59:20

**solely** 68:3

**sort** 26:6

**source** 48:3 49:15

**sources** 64:6

**sp** 3:12

**space** 58:3

**speak** 37:19,21

**speaking** 51:25 74:17

**specific** 18:15 47:18  
52:15 56:21 62:4 63:24,  
25

**specifically** 24:17 42:20  
45:6 55:5

**spirit** 55:8

**spoken** 72:23

**spot** 67:12 68:2

**spread** 54:21

**spring** 54:21

**squeeze** 12:24

**stack** 46:3

**staff** 59:20,22 60:3,10,20  
62:9,11

**stamp** 28:5 45:7

**start** 3:9 27:2

**started** 12:12 33:9 40:22

**starting** 27:12 32:13

**state** 24:3

**stated** 55:6 56:12,13

**statements** 24:25 69:23  
70:3,6 71:4

**status** 19:3,9,15

**stay** 12:19

**stayed** 11:5

**stick** 76:19

**straightforward** 24:13  
56:19

**STREET** 3:4,8,15,17,25  
4:4,9,23 5:1,5,11,14,23  
6:5,10,13,19 7:1,4,17,22  
8:5 9:3,8,12,25 10:2,7,  
14,18,24 11:2,10,16,22  
12:3,11 13:3,9,13,16,25  
14:5,9,13,18,21,25 15:7,  
10,22 16:1,4,10,15,18,21  
17:1,6,9,18,23 18:2,4,8,  
11,14,19,22 19:6,19  
20:1,5,8,14,16,19,22,25  
21:3,10,15,21 22:4,13,  
16,24 23:13,25 24:23  
25:1,6,17 26:7 27:5,10,  
14,17,22,25 28:4,9,13,  
17,22 29:9,14,18,22  
30:10,23 31:4,10,14,21,  
23 32:2,10,20 33:19,23  
34:8,18,25 35:5,18,21,24  
36:2,9,23 37:2,6,9,13,18  
38:3,13,16,18,24 39:10,  
14,19,25 40:4,16 41:1,  
16,21 42:1,6,13 43:16  
44:6,18,24 45:6,10,13,  
16,19,22,25 47:4,11,13,  
25 48:6,8,14 49:3,18  
50:5,15,17,20 51:8,12,  
17,20,24 52:9,19,22  
53:1,4,7,9,14,22 54:1,10,  
17 55:1,11,13,25 56:3,6,  
16 57:1,4,8,12,16,19,22  
58:7,17 59:1,6,10,13,24  
60:9,12,17,21 61:1,11,  
15,18 62:1,5,17,25 63:6,  
16,20 64:12,21 65:4,10,  
13,18,25 66:9,12,23  
68:5,9,13,25 69:6,11,13,  
17 70:7,10,13,18,23  
71:3,10,16,19,25 72:6,8,  
12 73:6,12,18,22 74:2,  
14,20,24 75:3,9,18,22  
76:1,6,10,14,18,24 77:3

**strike** 20:5

**struck** 17:9,10



**struggling** 26:13  
**stuff** 27:3 32:22 33:10 76:18  
**subject** 24:2 25:24  
**subpoena** 3:11,20 36:16 37:14  
**subpoenaed** 37:17  
**summaries** 61:3  
**Summary** 16:24  
**supervisor** 26:4,6 50:8 53:24  
**supervisors** 43:23  
**supervisory** 26:11  
**supplement** 23:4,16 36:13  
**supplemental** 25:14  
**supports** 73:12  
**supposed** 4:6 23:3  
**surprised** 21:1  
**suspend** 24:15 68:24  
**suspended** 24:16 69:2  
**swap** 4:3  
**sweep** 46:21 48:21  
**system** 28:2

---

## T

---

**tab** 33:9  
**tabs** 33:7  
**takes** 67:7 75:6,7  
**taking** 8:19 15:5  
**talk** 13:24 19:24 24:12,22 25:21,22 32:7 36:11 75:13,17  
**talked** 13:22 17:15 29:6, 21 30:21 31:13 46:10 47:14 52:25 63:12  
**talking** 30:13 32:14 35:21 40:8 50:22,24 51:13 52:17 58:20,21 62:18,21 65:19,20  
**Tardy** 63:11

**team** 49:22,23,25 50:13, 14  
**teams** 51:16  
**technical** 47:17  
**technically** 62:22  
**telling** 8:11 21:7 25:16  
**tells** 43:16  
**ten** 75:16,22,25 76:1,4  
**Tennesseans** 56:24  
**terminate** 24:15 68:23  
**terminated** 68:2  
**termination** 56:21 71:5  
**terminations** 70:4  
**testified** 39:11  
**Texas** 72:18  
**text** 70:1  
**that'd** 42:24 73:18

**That'll** 9:22  
**thing** 8:22 12:23 17:3 23:24 27:1 29:20 31:2,15 32:25 41:14 43:5  
**things** 3:6 30:13,16,18 41:18 47:19  
**thinking** 11:20 17:19  
**thinks** 42:9  
**thought** 3:6 27:11 39:21 76:4  
**thousand** 62:12  
**Thursday** 9:10,11 13:7, 8,14 73:1,5

**time** 8:15,23 10:23 11:7 12:9,10,13 15:17 18:15 31:19 36:19 41:9 42:22 45:12 46:5  
**times** 56:14  
**timing** 10:22 16:22  
**title** 23:10  
**titled** 28:12  
**today** 21:17 36:10 59:10 72:25  
**told** 10:17 11:25 21:4 72:24

**tomorrow** 4:7 6:14,16, 18 73:1,16,20  
**top** 76:2,11  
**topic** 17:24  
**topics** 17:15 18:12,18  
**total** 39:22 76:5  
**touch** 11:25 36:20  
**track** 33:3  
**trailer** 46:13 47:8,19 48:4,12 49:12  
**training** 26:6  
**trial** 16:2 19:14  
**trouble** 6:12  
**true** 37:8  
**Tuesday** 9:8  
**two-year** 60:7  
**typo** 24:16 68:22

---

## U

---

**Uh-huh** 3:4,16,25 4:4 6:5,10 7:17 9:3 10:18 12:3 13:9,16 15:25 16:14,24 18:19 22:15 23:13,25 26:7 28:21 29:2,9,22 30:10,23 31:4, 10,20 32:20 33:19,23 35:18 36:23 39:19 40:16 45:21 47:4,11,13 48:8 49:3,18 52:9 53:22 56:3 62:5 63:16 65:25 66:23 68:25 69:11 70:7,18 73:21

**understand** 38:24  
**usual** 15:12

---

## V

---

**vague** 49:24  
**Vanderbilt** 57:13  
**vendor** 46:21  
**verified** 74:18 75:2  
**video** 49:22,23,25 50:13  
**voice** 41:18 42:8 51:25

**voicemail** 69:24  
**volume** 46:23 48:20,21  
**voted** 38:11

---

## W

---

**Wagner** 4:24 26:4 34:2 50:1,2,8 52:5 59:9 74:9 75:12  
**wanted** 15:14,15 21:5 34:10 36:11,19 37:24  
**wanting** 47:17 54:6  
**weakness** 55:7  
**Wednesday** 9:10  
**week** 4:10 5:17,18 16:6,7 72:17  
**weekly** 53:20  
**weeks** 6:1  
**weird** 10:22  
**west** 16:7  
**What'd** 11:1  
**whichever** 22:12  
**Who'd** 65:13  
**whoever's** 35:3  
**Wi-fi** 7:15,16 8:13  
**wife** 44:2,5  
**witnesses** 51:21  
**work** 4:17 5:9 6:9 38:11 44:8 47:3 48:10 50:25 51:2,3 56:25 61:7 74:12  
**worked** 26:18 38:22 48:16  
**workflow** 47:10  
**workflows** 47:20 48:25  
**working** 15:11 47:6 48:1 55:6 67:18  
**workplace** 17:20  
**works** 7:11 13:2 29:5 36:7 37:1 41:15 54:11 59:16 64:25  
**worldwide** 54:22  
**worth** 34:22

**wrapped** 30:4

**written** 41:17 42:7

**wrong** 32:24

---

**Y**

---

**yesterday** 10:25 11:3

---

**Z**

---

**Zoom** 10:17 13:15